



An
Coimisiún
Pleanála

Inspector's Report ABP-322316-25

Development	Construction of 61 residential units (a mix of terraced houses, apartments and duplex apartments) and all associated site works.
Location	'Clover Lodge' and associated lands, Knockroe, Kilcoole, Co. Wicklow
Planning Authority	Wicklow County Council
Planning Authority Reg. Ref.	24327
Applicant(s)	David Tempany.
Type of Application	Planning Permission.
Planning Authority Decision	Refuse Permission.
Type of Appeal	First Party
Appellant(s)	David Tempany.
Observer(s)	Robert Whelan. Caroline & Julian Krieger.
Date of Site Inspection	28 th July 2025.

Inspector

Elaine Sullivan

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1.0 Site Location and Description

- 1.1. The subject site has a stated area of 1.896ha and is on the southern edge of Greystones, Co. Wicklow. It is within the area known as Knockroe, approximately 3.4km to the south of the town centre and approximately 1.6km to the west of the coastline. The site is rectangular in shape, running along a northeast to southwest axis with a flat topography at generally the same level as the surrounding land. The western portion of the site has a two-storey residential dwelling, (Clover Lodge), a timber cabin and outbuildings in place. The eastern portion of the site is covered in scrub and grassland with trees and hedgerows in place throughout the site.
- 1.2. To the west, the site is bounded by the R761 – Kilcoole Road. The Kilquade Road / Kilcole Road junction is adjacent to the north-west corner of the site. The Knockroe Roundabout on the R774 is approximately 200m to the north of the site and provides the southern access route to Greystones from the N11.
- 1.3. The site shares a common boundary with two detached residential dwellings, Woodfield House to the north and with Knockroe Lodge. Woodfield House shares an access to the site from the R761 via a right of way. A private access lane running along the southern site boundary provides access to Knockroe Lodge.
- 1.4. To the south the site is bounded by the established residential area of Knockroe which comprises a mix of single storey, two storey and dormer houses. Further to the north of the site is the Charlesland development site which is zoned for employment use and forms part of the Charlesland Action Plan Area. To the north-west are the residential developments of Farrankelly and Eden Wood. The Hawkins Wood residential development was recently completed to the north-east of the site.

2.0 Proposed Development

- 2.1. Planning permission was originally sought for the demolition of 2 house and outbuildings and the construction of 61 residential units comprising 33 x 3-bed houses, 1 apartment block with 4 x 1-bed units and 4 x 2-bed units, 1 duplex block with 10 x 1-bed units and 10 x 2-bed units, around a central landscaped area of open space area with vehicular access from the R761, Kilcoole Road.

- 2.2. The proposal was significantly altered through further information (FI) and the changes resulted in modifications to the layout which changed the unit mix to 24 x 3-bed houses, 5 x 2-bed houses, 16 x 1-bed ground floor apartments and 16 x 2-bed duplex units. Changes were also made to the vehicular access from the R761 that resulted in moving the site access further north and closer to the Kilquade Road junction and providing a signalised junction.

3.0 Planning Authority Decision

3.1. Decision

The Planning Authority (PA) decided to refuse permission for the development for the following reason,

1. *Having regard to*
 - i. *The location of the development on the R 761,*
 - ii. *The revised site layout and access arrangements submitted on the 12th February 2025,*
 - iii. *The lack of clarity in respect to intervisibility at the proposed junction, the lack of an updated road safety audit, the need to resolve the impact of the access to Woodfield House on the proposed junction,*

It is considered that insufficient information has been provided to confirm that the development will not give rise to a serious traffic hazard, or impact on the freeflow and safety of traffic on the R761. The development would therefore be contrary to proper planning and sustainable development.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The decision of the PA was informed by two reports from the Planning Officer (PO). The first report dated the 16th of September 2024 recommended that further information (FI) was sought on 14 points which related to,

- Design details for the vehicular access to the site.
- Design details for the internal access roads and car parking.
- The layout and design of open space and play space within the development.
- The quality of communal open space.
- External design details to the apartment block.
- Design details for some houses.
- Details regarding the design of the surface water drainage.
- Part V details.
- Details regarding bike and bin storage.
- Pedestrian connectivity and childcare requirements.

A response was received from the applicant on the 12th of February 2025. The development was revised by altering the vehicular access and internal layout of the scheme. The changes resulted in a modification to the unit mix to comprise 24 x 3-bed houses, 5 x 2-bed houses, 16 x 1-bed ground floor apartments and 16 x 2-bed duplex units. Other alterations included,

- Moving the access from the R761 further north and including a traffic signal-controlled junction and pedestrian crossing instead of a right-turn lane and priority access.
- Providing a priority junction left turn was for vehicles from Woodfield House.
- Amending internal road layouts, with the main access road running along the northern edge of the site with the housing to the south.
- Reorientating the duplex block to face west towards the R761 with the back of the block bounding the public open space. Private space for these units was increased in lieu of providing communal space.
- Amending the house types to address concerns regarding overlooking.
- Redesigning bicycle and bin storage areas.
- Relocating the playground to the open space behind the duplex apartments and away from the road.

The FI was deemed to be significant and was readvertised.

The PO was generally satisfied that the applicant had addressed the issues regarding the layout of the scheme and the surface water details but determined that the issues relating to the access arrangements from the R761 and from Woodfield House had not been sufficiently addressed. They recommended that planning permission was refused on that basis and for the reasons outlined in Section 3.1 above.

3.2.2. Other Technical Reports

- **Roads Department** – Further information recommended regarding the design and arrangement of the access from the R761, the internal road layout and pedestrian facilities. A second report was prepared following the FI submission and determined that information regarding the impact of a signalised junction at the R761 was lacking and the proposed access to Woodfield House further complicated the junction layout. Concerns were raised about the safety of the paved area to the front of housing blocks B and C. The suitability of using a grass pavement as part of the road is questioned. No recommendation was provided.
- **Greystones Municipal District Engineer (MDE)** – Queries raised regarding the adequacy of access arrangements from the R761, including the width of the access, adequate space for a right-turning lane and sufficient sightlines, as well as access arrangements for Woodfield House and Knockroe Lodge. Recommendation to consider a signalised junction. Concerns raised regarding the arrangement and location of the playground and the layout of internal access roads and parking. Comments also included regarding the design of the surface water drainage plan. The second report of the MDE welcomed the proposal to install a signalised junction but queries were raised as to whether the R761 would need to be widened to accommodate the north bound, right-turning lane and, if adequate sightlines and turning movements can be provided. The revised access to Woodfield House is not acceptable and would result in a hazard. The response that the owners of Knockroe Lodge are not in favour of moving their access is noted. Changes to the internal arrangement are noted and improve the overall layout is improved.

The use of 'grasscrete' is not supported. The redesign of the layout has generally addressed the issues raised regarding surface water drainage. No recommendation was provided

- **Fire Officer** – No objection. Request that specific conditions attached should permission be granted.
- **Waste Management Section** – No objection. Prior to commencement details of the management of construction waste to be provided.
- **Housing & Capital Projects** – No contact was made pre-planning. Part V arrangements to be agreed prior to the commencement of development.

3.3. Prescribed Bodies

- **Uisce Éireann** – No objection in principle.
- **Department of Housing, Local Government and Heritage** – The site is in the environs of a cluster of archaeological monuments identified in the Archaeological Survey of Ireland. The Dept. recommends that a detailed and field-based Archaeological Impact Assessment Report be requested as further information.
- **TII** – Regard should be had to relevant TII and national guidance.

3.4. Third Party Observations

A total of 5 third-party submissions were received by the PA during the public consultation process. The main issues raised related to the following,

- Insufficient public infrastructure & services to cater for the development.
- Excessive density and height.
- Unsafe access to/from the R761.
- Overlooking and overshadowing of Woodfield House.
- Disturbance during construction.
- Apartments and duplexes are out of character.
- Trees should be retained.

- Increase in traffic on busy local roads.
- Premature development pending the preparation of a new LAP.
- Wicklow housing targets have been exceeded.
- Long internal road – needs traffic calming

A further 2 submissions were received on foot of the applicant's response to FI. These were from the residents of Knockroe Lodge and Woodfield House.

- The owner of Knockroe lodge wanted to clarify the comments regarding access in the FI response. They had offered to close the access to the R761 from Knockroe Lodge and to access their property through the estate in return for the provision of a second entrance to the property to facilitate future development. This proposal was rejected. Additional comments state that the revised proposal moves the houses closer to Knockroe Lodge which is single storey and will be impacted by the two storey houses, the configuration of houses 10-18 is very dense and leaves insufficient space for a road and separate pavement in front of these houses and that the hair-pin bend configuration needs to be redesigned.
- The owners of Woodfield house do not agree to the changes proposed and state that the changes proposed to the entrance to Woodfield House will result in a traffic hazard as the occupants will have to block the junction to open and close their gates.

4.0 Planning History

No recent planning history for the site.

On sites nearby –

- **ABP-305773-19** – On a site to the north-east of the subject site - Planning permission granted by An Bord Pleanála (ABP) for a Strategic Housing Development (SHD) for 354 units at 'Glenheron C', Greystones Co. Wicklow.
- **PA Ref. 22/168** – On a site to the north-east of the subject site and to the south of the SHD permitted under ABP-305773-19 - Planning permission

granted by the PA on the 17th of April 2022 for a 1 - 3-storey post-primary school.

- **ABP-305476-19** – On a site to the north-west of the subject site - Planning permission granted by ABP for a SHD for 426 residential units and a creche at Farrankelly and Killincarraig townlands Delgany, Co. Wicklow.

5.0 Policy Context

5.1. Development Plan

Wicklow County Development Plan 2022-2028 (WCDP)

- 5.1.1. The subject site is within the boundary of the Greystones – Delgany & Kilcoole Local Area Plan 2013-2019 (GDK LAP). This LAP expired in 2019 and the WCDP contains a commitment to prepare a new LAP for Greystones – Delgany and Kilcoole during the lifetime of the plan.
- 5.1.2. Variation No. 2 of the WCDP was adopted and came into effect on the 12th of May 2025. It brought the existing LAPs into the WCDP while new plans were being prepared. Section 5.0 of Variation 2 states that, *‘The existing Local Area Plan will remain in place until that LAP is superseded by a new plan’*.
- 5.1.3. Variation No. 4 was proposed for the WCDP and went on public display in May 2025. The reason for the variation was to make a new local land-use plan (a Local Planning Framework (LPF)) for the towns of Greystones-Delgany and Kilcoole. When adopted, the LPF will be integrated into the Development Plan and will replace the *‘Greystones – Delgany and Kilcoole Local Area Plan 2013-2019’*. At the time of writing, Variation No. 4 has been on public consultation but had not been formally adopted.
- 5.1.4. The following extracts from the WCDP relate to aspects of the subject development but is not an exhaustive list of all relevant policies and objectives contained in the Development Plan.
- 5.1.5. **Zoning** - The subject site is zoned objective ‘RE’– Existing Residential’ in the Greystones-Delgany and Kilcoole Local Area Plan (LAP) 2013-2019, now adopted

into the WCDP. This zoning objective has been retained and carried forward into the Draft GDK LPF.

5.1.6. **Chapter 3 – Core Strategy**

Table 3.3 – Wicklow Settlement Hierarchy

Although the address of the site is 'Kilcoole', it is located within the CSO settlement boundary for Greystones and was assessed by the PA on that basis.

Greystones – Delgany is categorised as a Self-Sustaining Growth Town - Towns in Level 3 are targeted for growth rates of 25%-30%, with slight variations based on capacity / past trends. It is estimated that growth in Greystones – Delgany will exceed this target range before the end of the plan period due to legacy housing developments under construction

3.4 – Population & Housing Allocations

Table 3.5 - Wicklow Settlement / Aggregate Settlement Housing Targets to Q2 2028 and Q4 2031 – Greystones-Delgany – total housing growth 2016-2031 = 1,953.

Appendix 1 – Development & Design Standards

2.1.4 – Public Roads

Regional road development control objectives.

1. Works carried out on regional roads shall generally comply with TII 'Design Manual for Roads & Bridges' or DMURS (whichever is applicable) as may be amended and revised, unless local conditions determine otherwise.
2. A new means of access onto a regional road will be strictly controlled and may be considered if one of the following circumstances applies:
 - The regional road passes through a designated settlement and a speed limit of 50km/h or less applies;
 - Where the new access is intended to replace an existing deficient one; (This does not imply that permission will be granted for additional vehicular movements onto the regional road on the basis that the existing access is being improved).

- Where it is demonstrated that the entrance is essential and no other means of access is available.

3. Permission will generally not be considered for new development adjoining the regional road even where no vehicular access is created because hazardous situations often still arise due to unregulated parking and the opening of pedestrian routes.

2.1.9 – Entrances and sightlines – sets out the requirements for new vehicular access arrangements

3.0 – Mixed-Use and Housing Developments

3.1.1 – Intensity of Development (density)

It is Council policy to encourage higher residential densities at suitable locations in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

Apartments will be considered favourably in the Key Towns and the Self-Sustaining Growth Towns. High quality smaller scale apartment development will be considered in the self-sustaining towns and small towns, provided that adequate services and amenities are in place to serve the development including high quality public open space.

Table 3.1 – Density Standards – Kilcoole is listed under the ‘Small Towns and Villages’ category which is defined in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) as those with a population ranging from 400 to 5,000 persons. In these areas density of 30 - 40+ units per hectare may be appropriate for centrally located sites and 2 - 35 units per hectare for edge of centre sites.

3.1.4 – Open Space –

- Open space shall be provided in all new developments, the scale of which shall be dependent of the use of the building/site.
- Within apartment developments, private and communal amenity space shall be provided in accordance with the Design Standards for New Apartments (DSFNA 2018) as amended and as may be amended in the future.

- Dwellings shall generally be provided with private open space at the following minimum rates: 1-2 bedrooms – 50sqm / 3+ bedrooms 60-75sqm.
- Own door duplexes shall generally be provided with private open space at the following minimum rates: 1 bedroom – 10sqm / 2/3/4 bedrooms – 10sqm for the first bedroom and 5sqm per additional bedroom.
- Public open space shall be provided in accordance with the standards set out in Section 8. In particular, - Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made.

3.1.5 – Car parking - 2 off-street car parking spaces shall normally be required for all dwelling units over 2 bedrooms in size. For every 5 residential units provided with only 1 space, 1 visitor space shall be provided.

5.1.7. The following extracts are taken from the **Draft Greystones-Delgany and Kilcoole LPF** contained in Variation No. 4 of the WCDP

The subject site is zoned objective 'RE – Existing Residential' in the Draft LPF. The objective of the RE zoning is '*To protect, provide and improve residential amenities of existing residential areas*'.

Greystones - Delgany is a Level 3 settlement in the County settlement hierarchy – a 'self-sustaining growth town'.

A2.4 – Population and Housing

Population & Housing Development Strategy – includes the following -

- To adhere to the objectives of the Wicklow County Development Plan in regard to population and housing as are applicable to Greystones-Delgany and Kilcoole...
- A minimum of 30% of the targeted housing growth shall be directed into the existing built up area of the settlements, on lands zoned 'town centre', 'village centre', 'existing residential' and 'mixed use'... There shall be no quantitative

restriction on the number of units that may be delivered within the built up envelope of the towns.

- To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors in the town / village centres for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.

B.2 Residential Development - The residential development strategies, objectives and standards set out in the Wicklow County Development Plan will apply directly in Greystones – Delgany and Kilcoole. Amongst other things, the Development Plan addresses,

- The Wicklow County Housing Strategy
- Sustainable Communities
- Densities
- Quality of Design in New Housing Developments

Housing Targets & Extant Planning Permissions - Having regard to the Core Strategy and population / housing targets provided therein for Greystones – Delgany and Kilcoole, there is capacity within the lands zoned TC, VC, RE (all located in the serviced, built-up envelope) and lands zoned RN1 to meet current targets.

Greystones – Delgany & Kilcoole Housing Objectives -

GDK15 - The priority for housing growth shall be the existing built-up area of the settlements, on lands zoned 'town centre', 'village centre', 'mixed use' and 'existing residential'. Development shall extend outwards from the centres of Greystones, Delgany and Kilcoole with undeveloped land closest to the centre and public transport routes given priority. 'Leapfrogging' to peripheral areas shall be strongly resisted. In cognisance that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this LPF or the associated tables on the number of units that may be delivered within the built-up envelope of the towns/villages.

GDK17 - To require that new residential development represents an efficient use of land and achieves the highest densities suitable to that site subject to the reasonable

protection of existing residential amenities and the established character of existing settlements. In promoting higher densities and more compact development, new development should demonstrate compliance with:

- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DoHLGH 2024)
- Design Standards for New Apartments Guidelines for Planning Authorities (DoHLGH 2023)
- Urban Development and Building height Guidelines for Planning Authorities (DoHLGH 2018)
- Design Manual for Urban Roads and Streets (DMURS);
- any subsequent / replacement Ministerial / Government guidelines.

GDK19 - In areas zoned 'Existing Residential' house improvements, alterations and extensions and appropriate infill residential development (including that which comprises the replacement of existing lower density development with higher density development) in accordance with principles of good design and protection of existing residential amenity will normally be permitted (other than on lands permitted or designated as open space, see CPO 6.25 of the Wicklow County Development Plan). While new developments shall have regard to the protection of the residential and architectural amenities of houses in the immediate environs, alternative and contemporary designs shall be encouraged (including alternative materials, heights and building forms), to provide for visual diversity.

5.2. National Policy & Guidelines

5.2.1. National Planning Framework First Revision (2025) (NPF)

The first revision to the NPF was approved by Government in April 2025. The NPF provides a series of National Policy Objectives (NPOs) which seek to strengthen and consolidate existing settlements. The Revised NPF also projects a significant increase in housing needs, anticipating an average of 50,000 new homes per year to 2040. The increased projections will subsequently increase the housing targets per county.

5.2.2. **Sustainable Residential Development and Compact Settlement Guidelines 2024**

These Section 28 Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) and support the application of densities that respond to settlement size and different contexts within each settlement type. In accordance with the principles contained in the NPF, the Guidelines seek to prioritise compact growth and a renewal of existing settlements. Section 3.3 of the Guidelines refers to Settlements, Area Types and Density Ranges. For each settlement tier it sets out,

- priorities for compact growth,
- areas common to settlements at each tier, and
- recommended density ranges for each area.

For each application it is necessary for the planning authority to identify,

- the most applicable settlement category based on the categories described in Section 3.34,
- the most applicable area type based on the area descriptions detailed in Section 3.3 (e.g. central, urban, suburban or edge- refer also Figure 3.1), and
- the recommended density range for that area.

These Section 28 Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) and support the application of densities that respond to settlement size and different contexts within each settlement type. In accordance with the principles contained in the NPF, the Guidelines seek to prioritise compact growth and a renewal of existing settlements. Section 3.3 of the Guidelines refers to Settlements, Area Types and Density Ranges. For each settlement tier it sets out,

- priorities for compact growth,
- areas common to settlements at each tier, and
- recommended density ranges for each area.

For each application it will be necessary for the planning authority to identify,

- the most applicable settlement category based on the categories described in Section 3.34,
- the most applicable area type based on the area descriptions detailed in Section 3.3 (e.g. central, urban, suburban or edge- refer also Figure 3.1), and
- the recommended density range for that area.

Section 3.3.3 – Key Towns and Large Towns (5,000+ population)

The Settlement Strategy for the county categorises Greystones as a ‘Self-Sustaining Growth Town’ in the Core Region, which is one level below the Core Region Key Towns in the hierarchy. The settlement does not directly align with the categories set out in Section 3.3 of the Guidelines. However, given the population and location of the Greystones – Delgany settlement, I consider the most applicable category to be ‘Key Towns and Large Towns’ (5,000+ population).

Density – Within the ‘Key Town’ settlement, the site would be further categorised as a Suburban/Urban Extension. It is an objective of the Guidelines that residential densities of 35-50 units per hectare (net) shall generally be applied at suburban and urban extension locations.

- SPPR 1 – relates to separation distances between buildings and requires a minimum of 16 metres between opposing windows above ground level.
- SPPR 2 – sets out the minimum private open space standards for houses; 1 bed – 20sqm, 2 bed – 30sqm, 3 bed – 40sqm and 4bed + - 50sqm.
- SPPR 3 – relates to car parking standards. In city centres car parking should be minimised, substantially reduced or wholly eliminated. In accessible location (defined in Table 3.8) the maximum rate should be 1.5 car spaces per dwelling. In intermediate and peripheral locations (defined in Table 3.8) the maximum rate of car parking shall be 2 spaces per dwelling. The subject site is categorised as a ‘peripheral location’.
- SPPR 4 – relates to cycle parking and storage facilities.

**5.2.3. Sustainable Urban Housing - Design Standards for New Apartments
(Guidelines for Planning Authorities), 2023.**

- The guidelines support the use of infill sites in urban locations to provide higher density apartment developments.
- SPPR1 - Apartment developments may include up to 50% one-bedroom or studio type units, (with no more than 25% as studios).
- SPPR2 – For urban infill schemes on sites of up to 0.25ha, where up to 9 residential units are proposed, (notwithstanding SPPR1), there shall be no restriction on dwelling mix.
- SPPR3 – Sets out the standards for minimum apartment floor areas.
- SPPR4 – Sets out the minimum number of dual aspect apartments to be provided in any scheme; a minimum of 33% dual aspect units are required in more central and accessible locations, a minimum of 50% in a suburban or intermediate location and on urban infill sites of any size or on sites of up to 0.25ha planning authorities may exercise discretion to allow lower than the 33% minimum.
- SPPR5 – Specifies floor to ceiling heights.
- SPPR6 – Specified maximum number of apartments per floor core.
- Appendix 1 – sets out the minimum requirements for aggregate floor areas, room areas and widths, storage space, private and communal amenity space.
- Car Parking – In areas that are well served by public transport, the default position is for car parking provision to be minimised, substantially reduced or wholly eliminated. This is particularly applicable where a confluence of public transport options is in close proximity.

5.3. Natural Heritage Designations

- 5.3.1. The proposed development is not within or adjoining a Natural Heritage Area (NHA) or a proposed Natural Heritage Area (pNHA).

5.4. EIA Screening

- 5.4.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of appeal relate to the reasons for refusal and include the following,

- The applicant notes that the access arrangements were revised at the specific request of the PA and following detailed engagement with the PA during the FI process.
- Both the original and revised design were developed in accordance with all relevant design guidance. The designs were informed by comprehensive traffic volume surveys and forecasting. A full Traffic and Transport Assessment (TTA) was also undertaken in accordance with the TII Guidelines for Traffic and Transport Assessment.
- Regarding refusal reason 1(i) – the location of the development off the R761, the applicant notes that residential development is permitted in principle in the RE zoning objective. There are currently two entrances to the lands. The proposal would result in a single access off this road which will be signal controlled with appropriate visibility splays.
- The WCDP does not contain any specific policy which restricts or prevents the creation of an access point to the subject site. The proposed development would comply with two of the four circumstances specified in Policy CPO 12.48 in the WCDP which seeks to control the provision of new access points onto regional roads.

- The accompanying technical report from the applicant's Consulting Engineers outlines how the proposed access will not interfere with the free flow and traffic safety on the R761 and how the revised location is an appropriate access to the development.
- Regarding refusal reason 1(ii) – revised site layout and access arrangements – whilst the revised access arrangement was not subject to an independent Road Safety Audit (RSA) at FI stage, a RSA has been prepared and submitted as part of the appeal.
- Item 1(iii)(a) – lack of clarity in respect of the intervisibility at the proposed junction, (b) the lack of an updated RSA, (c) – the need to resolve the impact of the access to Woodfield House on the proposed junction.
- Intervisibility – the technical response in the appeal states that 'intervisibility' is a technical term that can be most simply described as 'being able to see pedestrians standing at crossing points when you approach in your car from any direction'. The response highlights that the requirement to illustrate and confirm 'intervisibility' is no longer in the current TII Design Guidance Standards, however Drawing NRB-DD-102 submitted with the appeal demonstrates inter-visibility in accordance with the *Design Guidance TII Dn-GEO-03044*.
- Updated RSA – The applicant would have provided an RSA if it was requested by the PA. An independent RSA has been completed and provided in the appeal.
- Woodfield House access – the access to WH has been incorporated into the design of the junction with formal signal control provided for exits from the lightly trafficked private residence. The arrangement and access to Woodfield House was part of the design subject to an independent RSA and would provide a safe priority access to the R761 for WH. The applicant / technical response states that a similar access arrangement was recently designed and constructed in Newtownmountkenedy as part of a PA Part 8 scheme for a junction upgrade. The junction arrangement then became a condition of planning for a residential development by DRES Properties (**ABP – PL 27.241521, PA Ref. 06/6101**).

- Regarding the existing pedestrian crossing on the R761 to the north of the site, the existing push-button signal-controlled crossing can easily be linked to the operation of the signal-controlled junction hardware ('Signal Controller' box) through hard wire or cableless link. The appeal contends that this does not represent a barrier to the development of the site.
- FI request – Item 2 - Issues raised by PA re internal road layout - The PA raised some concerns regarding the internal road layout, the varying road surfaces proposed and the materials for the pathway. In response, the applicant states that the use of grasscrete in the road was to retain a visual connection between the two main areas of open space whilst also providing pedestrian priority. A coloured tarmac surface as proposed would provide a more suitable surface for wheelchair/buggy use. The applicant is happy to address these issues through condition.
- FI request – Item 12 – regarding the location of bin storage facilities serving apartments D1-D20 and A1-A8. The PA raised a concern that the proximity of the bins store to Woodfield House could give rise to noise and lighting issues. Although the applicant considers the location of the bin store to be acceptable, the appeal includes a proposal to construct the bin store with solid masonry walls on the sides nearest WH and an insulated roof. Adequate ventilation would also be provided. Drawing 1302 PLN 106 was submitted with the appeal and details the proposals.

6.2. Planning Authority Response

- No comments received on the appeal.

6.3. Observations

Two third party observations were received; one from the owners of Woodfield House which is directly to the of the site and which would share the access and one from the owners of Knockroe Lodge which adjoins the site to the east and accesses the R761 from a point to the south of the site.

Caroline and Julian Krieger, Woodfield House –

- The proposed new entrance from the R761 would not provide a safe road access to the site. The R761 is already a dangerous and busy road and the location of the entrance a dip in the road which would limit drivers' visibility and reaction times to cars turning left into the site.
- The proposed signal-controlled junction would not allow safe access and egress to Woodfield House as the junction would be blocked while the gates were opened or closed. The owners do not agree to the change in access arrangements for their house.
- Having a busy junction at the access to the house could result in a hazard for residents.
- The density and type of housing is out of character with the local area.
- Construction works will result in noise, dust pollution and disturbance.
- Clarity is required regarding whether the trees along the boundary will be retained.
- The development is premature pending the approval of the Greystones – Delgany – Kilcoole Plan, which is being prepared.
- The area has seen a massive development of new housing in recent years and has exceeded the housing targets set out in the *Wicklow County Development Plan 2022-2028*. The delivery of infrastructure and public services has not kept pace with development and there is a crisis of services.
- Transport services are also at maximum capacity at peak hours.

Robert Whelan, Knockroe Lodge –

- The junction referenced by the applicant in Newtownmountkennedy is not an applicable precedent. The property referenced as a busy medical practice was constructed over 100 years ago. The recent change to the nearby junction provides traffic lights and access to a housing development on the west side of the junction. The medical practice is on the east side of the junction and the new junction design does not change or validate the longstanding access to the medical practice, which has just two parking spaces.

- In Newtownmountkennedy the Council improved what was an imperfect but decades old junction. This should not be read as a validation of the proposed design approach. The proposed access should fall or stand on its own merits, as measured against modern planning standards and practice.
- The proposed density is excessive and the hair pin bend in the road design denies pedestrians and children a safe pavement in front of dwellings in a congested road bend.

7.0 **Assessment**

7.1. Having examined the application details and all other documentation on file, including all the submissions received in relation to the appeal, and inspected the site, and having regard to relevant local/regional/national policies and guidance, I consider that the main issues in this appeal are as follows:

- Principle of Development
- Access Road
- Density & Character
- Design & Layout
- Residential Amenity
- Housing Strategy

7.2. **Principle of Development**

7.2.1. The subject site is located within the boundary of the Greystones – Delgany & Kilcoole Local Area Plan (GDK LAP) 2013-2019, now expired. The WCDP contains a commitment to prepare a new Local Planning Framework (LPF) for Greystones – Delgany and Kilcoole during the lifetime of the plan. Variation No. 4 was proposed for the WCDP and went on public display in May 2025. The reason for the variation was to make a new local land-use plan (a Local Planning Framework (LPF)) for the towns of Greystones-Delgany and Kilcoole. When adopted, the LPF will be integrated into the Development Plan and will replace the '*Greystones – Delgany*

and Kilcoole Local Area Plan 2013-2019. At the time of writing, Variation No. 4 has been on public consultation but had not been formally adopted.

7.2.2. Variation No. 2 of the WCDP was adopted and came into effect on the 12th of May 2025. It brought the existing LAPs into the WCDP while new plans were being prepared. Section 5.0 of Variation 2 states that, *'The existing Local Area Plan will remain in place until that LAP is superseded by a new plan'*.

7.2.3. The subject site is zoned objective 'RE' – Existing Residential' in the Greystones-Delgany and Kilcoole Local Area Plan (LAP) 2013-2019, now adopted into the WCDP. This zoning objective has been retained and carried forward into the Draft GDK LPF.

7.2.4. I am satisfied that the principle of the development is acceptable and that the RE – Existing Residential zoning objective allows for the consideration of a housing development subject to the policies and objectives of the WCDP.

7.3. Access Road

7.3.1. In the reason for refusal, the PA considered that insufficient information had been provided to confirm that the development will not give rise to a serious traffic hazard, or impact on the free flow and safety of traffic on the R761.

7.3.2. The subject site is located on the southern outskirts of Greystones and is adjacent to the R761 Kilcoole Road / Kilquade Road priority junction. The R761 is subject to a 60kmph urban speed restriction to the front of the site. There are currently two detached houses and some outhouses in place on the western part of the site. The eastern part of the site is undeveloped and was overgrown on the occasion of the site inspection.

7.3.3. The most northerly house/timber lodge on the site shares an access from the R761 with Woodfield House, which bounds the site to the north. This property also has a secondary access from the R761 approximately 30m to the south of the shared access. The entrance gate to Woodfield House is slightly set back from the road and there is a right of way over the subject site to allow access to the house. To the south, the second house on the site (Clover Lodge) is accessed from a shared laneway that runs along the southern site boundary. The laneway also provides

access to Knockroe Lodge, which is a detached property that adjoins the eastern site boundary.

- 7.3.4. A signalised pedestrian crossing is in place approximately 45m to the north of the Kilquade Road / Kilcoole Road junction. Additional signalised pedestrian crossings are in place at the Knockroe Roundabout which is approximately 200m to the north of the Kilquade Road junction. These lights were not operational on the day of the site visit.
- 7.3.5. The original development proposal sought to retain the existing access to Woodfield House and to provide an additional entrance to the development at a point approximately 10m to the south of the Woodfield entrance and to the south of the Kilquade Road junction. A priority right-turning lane was proposed for the development to facilitate traffic flows on the R761. A Transportation Assessment Report (TA) and a Road Safety Audit (RSA) were prepared for the development and submitted with the proposal.
- 7.3.6. In their assessment of the application, the PA were not supportive of the additional access point on the R761 and the overall internal layout of the development. The applicant was requested to submit a revised design solution for the vehicular entrance which addressed concerns regarding sufficient space for the right-turning lane, adequate sightlines and to consider the option of providing a signalised junction in line with the Kilquade Road junction. The applicant responded to the request by retaining and modifying the original shared access to the site. It was also proposed to include a signal-controlled junction at Kilquade Road with new road-marking to tie into existing, a new realigned 2m wide footpath along the R761 and to widen the R761 to accommodate a right-turning lane. The access to Woodfield House would generally be retained as is. However, the slip road onto the main estate road would be signal controlled and would tie-into the signal-controlled junction on the main road. A loop-detector or MVD would be installed to call green when required for people exiting Woodfield House. No changes were made to the access arrangement for Knockroe Lodge.
- 7.3.7. Whilst the PA were supportive of the proposal to signalise the junction, they noted that the revised arrangement contained no details as to how the junction would impact the traffic flows on the regional road. They also found the access

arrangement to Woodfield House to be unacceptable as it would add an extra sequence to the junction and would have poor intervisibility to the rest of the junction which could result in vehicular and/or pedestrian conflict.

- 7.3.8. In their appeal the applicant submitted a technical report from their Consulting Engineers. The report notes that the proposal represents the consolidation of existing access points onto the R761. Notwithstanding this, the Development Plan does not contain any policies that would specifically protect the R761 at this location. The signalised arrangement came about from meetings with the PA and on foot of a request for FI. An RSA was prepared for the junction as part of the appeal and all matters raised have been signed off by the Design Team. The report also states that although the requirement to confirm inter-visibility, (i.e. being able to see all pedestrians standing at the crossing points when you approach from any direction), is no longer in the most up to date TII guidance, it is demonstrated on Drawing NRB-DD-102 submitted with the appeal. Regarding the access to Woodfield House, reference is made to a similar arrangement at 'Fishers Junction' whereby a medical practice on Regional Road R772 was incorporated into the signal control and design of the junction upgrade.
- 7.3.9. The appeal did not directly respond to the query of the PA regarding the impact of the signalised junction on the existing traffic flow on the R761. However, it notes the conclusion of the TA which found that a simple priority junction was all that was required to cater for the development.
- 7.3.10. The TA prepared in accordance with TII guidance and was informed by traffic studies carried out in January 2024 when schools were fully open. The results found that the road network and the originally proposed access junction was more than adequate to accommodate the worst-case traffic scenario associated with the facility. The TA also confirmed that the construction and full operation of the scheme would have a negligible and unnoticeable impact on the operation of the road network.
- 7.3.11. Surveys carried out on the Kilcoole Road at the front of the site found that the road was moderately or heavily trafficked. This was based on results which showed that it carried a weekday AM Peak Hour 2-way flow of approximately 946 Private Car Users (PCUs) and a weekday PM Peak Hour 2-way flow of approximately 845 PCUs. For context, the TA notes that semi-urban roads of this nature have a

theoretical free-flow link capacity of 1,000 to 1,2000 PCUs per-direction, per-hour. Kilquade Road was found to be lightly trafficked with a weekday AM Peak Hour 2-way flow of approximately 240 PCUs and a weekday PM Peak Hour 2-way flow of approximately 196 PCUs, measured from a point immediately west of the R761 junction.

- 7.3.12. Four junctions in the surrounding road network were assessed in the TA; the Kilquade Road / Kilcoole Road junction, Knockroe Roundabout junction (to the north of the site), and the Ballynerrin Roundabout junction (to the east of the Knockroe junction and at the entrance to the Hawkins Wood SHD development) and the roundabout to the south of the Ballynerrin roundabout with access to the Enterprise Centre / Sports Park / Adventure Play Park. Traffic to be generated by the development was calculated using the industry-standard TRICS database. The calculation was based on 33 no. houses and 28 no. duplex units, which changed to 29 no. houses and 32 no. duplex units through FI. Although the unit mix has changed since the original assessment, the overall number of units remained the same and I am satisfied that the minor change in unit types overall would not result in any significant changes to the results of the TA in terms of traffic generation. In fact, the reduction in the number of houses could slightly reduce the number of trips as Table 3.1 of the TA shows that the TRICS data gives a higher figure per unit for houses than duplex units. In accordance with TII guidance, traffic growth figures were applied to the baseline survey results for the selected opening year of 2028 and the design year of 2043, (2028 plus 15 years as per the TII guidelines).
- 7.3.13. TII Traffic and Transport Assessment Guidelines requires a Threshold Assessment of the impact on the local roads to be provided in order to determine whether further detailed modelling and assessment of particular critical junctions is necessary. The recommendation is that, if the expected increase is 5% for networks that are considered trafficked or congested then further analysis is warranted. The TA found that the proposed opening and operation of the development would not result in any significant or noticeable level of new trips on the local roads, with anticipated traffic increases beyond the proposed site access junction expected to be well below the industry standard level of 5%.
- 7.3.14. The highest traffic increase from the development was found to be at the Kilquade Road / Kilcoole Road junction which would have an AM Peak Hour increase of

1.75% and a PM Peak Hour increase of 1.71%. Although the TA concluded that the introduction of the proposed development would have a negligible and unnoticeable impact on the on traffic conditions locally, a detailed capacity model of the proposed site access was carried out.

- 7.3.15. The capacity of the proposed (priority) access junction was also modelled using the PICADY software package. PICADY produces results based on a ratio of flow capacity (RFC) and queue length. An RFC greater than 1.00 indicates that a junction is operating at or above capacity, with 0.85 considered to be the optimum RFC value. A full set of results is contained in Appendix E of the TA. All results showed that a simple priority junction has significantly more than adequate capacity to accommodate worst case traffic* associated with the development and confirms that an alternative form of control is not warranted.

*Note: the worst-case traffic in the scenario was for the 2043 design year (with applied growth rates), which had a Max RFC of 0.02 during Peak hour period.

- 7.3.16. Whilst the concerns of the PA with regard to the impact of the signalised junction on traffic flow was not addressed in the appeal, I am satisfied that the results of the TA demonstrates that the traffic levels from the development will be low and that the existing road network has the capacity to absorb the additional trips. During the site inspection, which was carried out at lunch time on a weekday, I observed that there was a steady flow of traffic along the R761. Although the TA concluded that a simple priority junction was sufficient to cater for the development, I accept the views of the PA that a signalised junction would be a more rational response to accommodate the proposed development and the Kilquade Road junction. I am also satisfied that the applicant has demonstrated intervisibility at the junction.

- 7.3.17. I note the concerns of the PA regarding the access arrangement to Woodfield House, and I consider them to be reasonable. Although the existing entrance complicates the junction, the design evolved from a request by the PA to incorporate the existing entrance into the main entrance to the development. In their assessment, the PA suggested that the existing access could be moved further east within the site where it would connect with the internal access road and avoid the additional signal change to allow cars in and out. The applicant has not addressed this in their appeal and has not commented on whether such a proposal is possible.

Although the applicant is the owner of the land, Woodfield Road has a right of way over the site, which could complicate agreements between the parties. I agree with the PA that positioning the access to Woodfield House further east within the site would appear to be a more logical and safer arrangement. However, the feasibility of the proposal has not been examined in terms of a swept path analysis, the provision of sufficient internal radii, visibility and overall safety. Measurements taken from the Proposed Site Plan also indicate that there is a pinch point of just 5m between the red line boundary and the internal road carriageway to the east of the existing gate to Woodfield House, which could restrict vehicular movement. In the absence of such information, I will assess the suitability of the proposal presented in the FI response.

- 7.3.18. The applicant referred to 'Fishers Junction' in Newtownmountkennedy (**ABP-PL 27.241521, PA Ref. 06/6101**) as having a similar design response to the subject proposal. As part of my site inspection, I visited the junction and observed the additional signal arrangement to allow access to the medical centre. On the occasion of the site visit, the junction appeared to be a much busier traffic environment than the Kilquade Road / Kilcoole Road junction. The junction leads into the town centre and there is end-on parking on the Kilquade Road approach. However, the additional traffic lights to service the medical centre appeared to work effectively and the access to and from the centre was not restricted. Third party concerns are noted and whilst observers note that the retrofitting of a historical property into a new junction should not be held up as an example, this is the exact situation that much be addressed in the subject proposal.
- 7.3.19. Woodfield House is a private residence that will have low traffic movements. The owners have expressed concerns that their cars will block the access while they open and close the gates, which will result in a hazard. Drawings submitted with the proposal show that the slip road would provide a minimum of 7m to the front of the gate, which is sufficient for a car or larger vehicle to pull in while the gates are opened.
- 7.3.20. I am satisfied that the proposed arrangement will be suitable to accommodate the existing house and the residential development and that the RSA submitted with the appeal demonstrates that it can be delivered safely. The low level of traffic to be generated by the development is also taken into consideration regarding traffic flows

on the R761. The technical report in the appeal also states that the existing push button signal controlled crossing to the north of the site can be easily linked to the operation of the subject site signal-controlled hardware ('Signal Controller') box by way of either a hard-wired or cableless link and does not represent a barrier to the development of the site as proposed.

- 7.3.21. The PA also stated that their preferred option for access to Knockroe Lodge would be from the development with the access laneway along the southern boundary being subsumed into the development. It is the opinion of the PA that this arrangement would further reduce the number of access points onto the R761 and would increase the security of the existing and proposed houses that back on to the lane. The applicant states that this was presented as an option to the owners who were not in favour. In response, the owner of Knockroe Lodge states they had offered to close the access to the R761 and to access their property through the estate in return for the provision of a second entrance to the property to facilitate future development, which was declined by the applicant. I would agree with the PA that closing the lane would be a more logical response for the development, whilst also improving security for all properties on the lane. However, the complications arising from third party agreements are noted and accepted. Should an agreement be reached in the future the issue can be addressed through a subsequent consent process.

7.4. Density & Character

- 7.4.1. The proposed development would have a density of approximately 40 units per hectare. The site is within the CSO settlement boundary of Greystones, which is defined as a Level 3 – 'Self-Sustaining Growth Town' in the County settlement hierarchy.
- 7.4.2. The WCDP density standards are taken from the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and are set out in Table 6.1. The recommended density for Greystones-Delgany in the WCDP is a minimum of 35-50 dwellings per hectare for outer suburban / greenfield sites. Since the adoption of the Development Plan, the guidelines have been superseded by the Compact Settlements Guidelines which outlines a tailored approach to density in

different settlement types. Within the Compact Settlements Guidelines, the site is categorised as a 'Suburban / Outer Extension' in a 'Key Town' settlement. It is an objective of the Guidelines that residential densities of 35-50 units per hectare (net) shall generally be applied at suburban and urban extension locations.

- 7.4.3. Based on the development standards alone, the proposed density is in accordance with the recommendations of the WCDP and the Compact Settlements Guidelines and is considered acceptable. However, the scale of the proposal and its impact on the amenity of the surrounding area must also be considered.
- 7.4.4. Third parties argue that the design and mix of housing typology is out of character with the area and is unsuitable. The proposal comprises 5 no. 2-bed (4 person) houses, 4 no. 3-bed (4 person) houses, 20 no. 3-bed (5 person) houses, 16 no. 1-bed (2 person) duplex units and 16 no. 2-bed (4 person) duplex units. Chapter 6 of the WCDP encourages a range of housing typologies in residential developments. Section 6.3.5 states that, *'New development should incorporate a mix of dwelling types and heights to achieve minimum densities and create interesting and attractive settlements.'* In general, a mix of heights and typologies is also encouraged to facilitate sustainable communities and to ensure a good quality of design.
- 7.4.5. The proposed development would comprise two storey houses and three storey duplex units, (with 1 and 2-bed apartments). Whilst the sites immediately adjoining the development comprise single storey detached houses, there is a mix of unit types in the wider area. The development at Farrankelly, on the opposite side of the road includes a mix of two storey houses with some terraces bookended with a three-storey element. The Eden Wood development directly to the north of Farrankelly contains a mix of four storey apartments and two storey houses and the residential area of Knockroe to the south of the site is a long-established area which has a mix of single and two storey houses. The recently completed development at Hawkins Wood to the north-east of the site also has a mix of three storey duplex units and two storey houses. Therefore, I do not consider the mix of building types to be out of character with the surrounding area and the emerging pattern of development. The three storey duplex units would be positioned towards the front of the site and would be screened from view by the provision of trees along the western site boundary as per the site layout plan and the landscaping plan.

- 7.4.6. However, I note the concerns of the adjoining residents regarding the impact of the larger buildings on their residential amenity in terms of overlooking and/or loss of light and I will examine this in the relevant section below.

7.5. Design & Layout

- 7.5.1. In terms of the overall design and layout of the development, I am satisfied that it is in accordance with the development management requirements set out in the WCDP and the Compact Settlements Guidelines as they relate to density, open space, private open space and housing quality and mix. The layout proposed through FI removed the designated area of communal open space reserved for the apartments and duplex units and increased the size of the ground floor terraces instead. This approach is acceptable and is in accordance with Section 4.12 of the Apartment Guidelines which allows for the requirement for communal amenity space to be relaxed on sites of any size, or urban infill sites of up to 0.25ha, subject to overall design quality. The ground floor terraces face onto the public open space and play area and as such this area also functions as communal space. Both Duplex Blocks back onto the public open space and frame the north and western boundaries. The ground floor terraces have low level walls, (1.2m), which would allow for passive surveillance and the terraces at first and second floor levels also overlook the public open space. I am satisfied that this arrangement would allow for a good quality provision of private and public amenity space for residents. I note that the PA were also satisfied with this approach.
- 7.6. Whilst the PA found that the revised layout generally responded to their concerns regarding open space and the location of the play area, the report of the Roads Department considered that the paved area to the front of Blocks B and C to be undesirable and could result in unsafe vehicle movements. The use of grasscrete was also not supported. The Municipal District Engineer (MDE) also raised a concern regarding the number of different road surfaces proposed and the capital cost implication for their ongoing maintenance when taken in charge by the PA. They also note that the use of grasscrete should be rationalised and that the use of permeable paving is not permitted on the road carriageway.

7.7. The revised layout would result in an area of 'Shared Surface' in the eastern part of the site between housing Blocks B and C. The applicants appeal states that the overall rationale for the internal road layout is a 'pedestrian first' approach. The objective of the grasscrete road is such that the two main areas of public open space can remain visually connected and avoid creating a visual split that a traditional roadway would incur. However, the applicant states that all details can be agreed with the local authority if deemed necessary.

7.8. The infill site has a number of constraints to development which dictate the overall design and the location of housing. These include a 6m wide wayleave that crosses the middle of the site from north to south and a provision for a future pedestrian link to adjoining lands has been retained in the north-eastern corner of the site. The layout of the scheme was also redesigned to respond to the FI request to move the access to the site and to reconsider the layout and location of the open space. I accept the concerns of the PA regarding the mix of surface materials the cost of ongoing maintenance. However, I consider the proposal to provide a shared surface area to the front of Blocks B and C to be acceptable. Houses to the rear of the site require vehicular access and the provision of a shared surface would help to manage the speed of traffic within the scheme in a similar manner to the 'Homezone' concept. For this approach to be successful, landscaping and well-thought-out finishes are crucial. The proper implementation of the shared surface concept would result in an attractive, traffic-calmed environment. As the area will be taken in charge, the final mix of materials will have to be agreed with the PA. Whilst keeping in mind the importance of the final finishes to the shared surface arrangement, I am satisfied that that this can be dealt with through an appropriately worded planning condition should the Commission be minded to grant permission.

7.9. **Residential Amenity**

7.9.1. As noted previously, the duplex blocks are positioned to the front of the site and adjacent to the R761. Duplex Block A is the 12-unit block facing onto the R761 and orientated north to south. The gable end of this three storey block faces onto the access lane to Knockroe Lodge and to the rear of a dormer bungalow style house at Knockroe which backs onto the laneway. There would be approximately 15m

between the rear of the existing house at Knockroe and the southern gable end of Duplex Block A. The two-storey duplex unit at the southern end of the block would have an enclosed terrace at first floor level and a second terrace at second floor level. Elevations submitted with FI show an opening with a 1.2m high glazing at first floor level on the southern elevation and a 1.2m high glazed boundary to the second-floor terrace. The existing property at Knockroe has a timber boundary in place along their boundary to the laneway. There are also mature leylandii trees in place on the southern side of the lane which will be retained. Given the 15m distance between the properties, the design of the existing and proposed properties and the existing and proposed boundary treatments, I am satisfied that the proposal will not result in overlooking of existing properties at Knockroe. Block A would be orientated to the north of the houses and as such would not result in any significant overshadowing.

- 7.9.2. The residents of Woodfield House to the north, and Knockroe Lodge to the east, also expressed concerns regarding the impact of the proposal on their residential amenity. Duplex Block B would comprise 20 units, 10 no. 1-bed units at ground floor level and 10 no. 2-bed duplex units above. This block would be orientated east to west and would face onto the internal access road and towards Woodfield House. The front elevation of Block B would be 8.6m in height to the eaves level, with a ridge height of 11.4m. At its closest point, the front elevation of Block B would be c. 36m from Woodfield House. I am satisfied that the separation distance alone would prevent overlooking but the Proposed Site Plan also shows trees planted along the northern site boundary and to the rear of the bicycle and bin storage areas. A query was raised by third parties as to the treatment of the existing northern boundary with WH. The original Landscaping Plan and the Proposed Site Plan submitted with FI states that the existing boundary is to be trimmed, retained and reinforced and a new 2m high concrete post/panel and concrete fence boundary is to be installed along the line of the existing fence. The Arboricultural Report and accompanying drawings were prepared for the original layout of the site and show the retention of two trees, (No. 31 – a Category B2 Copper Beech and No. 32 – a Category B2 Walnut tree) in the north-western corner of the site. The drawings have not been updated to show the amendments layout within the site, and it appears that the revised road layout would require the removal of the walnut tree. Tree Line 4 and Hedge 10 are located

along the northern site boundary. Both features will be retained and are included in the Tree Protection Plan for the development.

- 7.9.3. Properties at Knockroe Lodge include a garage and outbuildings to the west of the site and close to the eastern boundary of the subject site, and the house which is centrally positioned within the site. The closest house to Knockroe Lodge would be No. 14 which would be in the south-eastern corner of the site. House No. 14 has been designed with only one obscured window at first floor level, facing towards Knockroe Lodge. It is also proposed to retain, reinforce and trim the existing boundary and to install a new 2m high concrete post/panel and concrete fence along the line of the existing fence. At its closest point, Knockroe Lodge would be approximately 23m from the site boundary, which would be sufficient to prevent overlooking. However, the design of the house and the proposed and existing boundary treatments will also prevent overlooking. I am also satisfied that by virtue of the scale to the two-storey house, its location to the west of Knockroe Lodge, and the separation distances between both, that the potential for overshadowing would be insignificant.
- 7.9.4. The applicant notes the concerns of the PA regarding the location of the bin store close to the site boundary with Woodfield House in terms of the potential for noise and nuisance. To address these concerns the grounds of appeal include a revised proposal (Drawing 1302 PLN 106) to construct the bin store with solid masonry walls on the sides closest to Woodfield House along with an insulated roof and adequate ventilation. The bin store would be approximately 14m from the closest elevation of Woodfield House. The existing treeline along the northern boundary would be retained and trimmed and a new 2m high post and panel fence would be installed. I am satisfied that the revised proposal along with the separation distance and the boundary treatment would be sufficient to mitigate against any undue noise or disturbance for the occupants of Woodfield House.

7.10. Housing Targets

- 7.11. Third party submissions raised concerns about the level of development that has taken place in Greystones / Delgany which has exceeded the housing targets in the WCDP. Submissions also state that the provision of public services has not kept

pace with development and that existing services and public transport are at capacity. The report of the PO did not directly address the issue of housing targets and capacity in Greystones / Delgany but instead notes the location of the site within the CSO town boundary and the pattern of development surrounding the site. The PO considered that *'the application site, which is zoned 'Residential' would result in the consolidation and completion of the zoned residential lands on this side of Greystones.'*

7.12. Chapter 4 of the WCDP categorises Greystones / Delgany as a Level 3 – Self-Sustaining Growth Town and notes that, while the 'growth town' designation would suggest that significant new population growth is planned for Greystones – Delgany for the duration of the WCDP, it is intended to reflect the growth that has already occurred in the 2016-2022 period having regard to housing development completed, underway and due for completion within this timeframe. The focus during the period of the current development plan will be on infill development and consolidation of the built-up area. At the time of writing, Variation No. 4 – which is related to the Draft Greystones – Delgany & Kilcoole Local Planning Framework had been through public consultation and was awaiting formal adoption. Part A:2 of Variation 4 notes that upon adoption of the WCDP, the amount of zoned land in pre-existing LAPs exceeded the amount of land needed to meet the Core Strategy 2031 housing targets for each of the towns set out in the Development Plan. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP/ LPF, with flexibility in the zoning provisions to ensure that targets can be achieved and 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. Section 6 of the variation states that development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated.

7.13. Table 2.2 of Variation No. 4 contains the Housing Growth Targets for Greystones / Delgany and Kilcoole, which are taken from the Core Strategy of the WCDP. The

figures in the table allow for an additional 1,953 housing units from 2016-2031. The PA did not address the issue of development exceeding the housing targets for Greystones to 2028 and there is no readily available information on whether this is the case. I note that the PA had no issue with the level of residential development proposed and were satisfied that the proposal for infill development on zoned lands within the town boundary represented an acceptable form of development and was in accordance with the overarching objectives of the WCDP to utilise appropriate under-used sites and to consolidate development within the town boundary.

Furthermore, it is noted that the increased population projections in the Revised NPF will necessitate an increase in the housing target figures in the Development Plans. The *NPF Implementation Housing Growth Requirements; Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act, 2000 (as amended) states that Wicklow County Council will require a new annual, new housing growth requirement of 2,068 to 2034. The Adopted Development Plan Annual Housing Requirement (Housing Supply Target) is currently 1,411.

- 7.14. One of the key parameters for the future physical development of Greystones-Delgany and Kilcoole is to consolidate development and to provide infill development with no further settlement expansion beyond the previous LAP boundary. I am satisfied that the proposed development is in accordance with the overarching development strategy for the town as set out in Chapter 4 of the WCDP and in the Draft GDK LPF contained in Variation No. 4.

8.0 AA Screening

- 8.1. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on The Murrough SPA (Site Code 004186), or on the The Murrough SAC (Site Code 002249) in view of the conservation objectives of the sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

- 8.2. This determination is based on:

- Scientific information provided in the Screening report.

- Distance from and weak indirect connections to the European sites.
- No potential for ex-situ impacts.
- Possible impacts identified would not be significant in terms of site-specific conservation objectives for The Murrough SPA (Site Code 004186), or on the The Murrough SAC (Site Code 002249) and would not undermine the maintenance of favorable conservation condition or delay or undermine the achievement of restoring favorable conservation status for those qualifying interests or features of unfavorable conservation status.

8.3. No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.

9.0 Recommendation

I recommend that planning permission is granted for the development.

10.0 Reasons and Considerations

10.1. Having regard to the nature of the development for the construction of 61 residential units on an infill site within the settlement boundary of Greystones, it is considered that the proposed development would be in accordance with the Wicklow County Development Plan 2022-2028 and would also be in accordance with national planning policy as set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. The proposed development would not seriously injure the amenities of the area or of property in the vicinity and would, therefore, be in accordance with the proper planning and sustainable development of the area.

11.0 Conditions

1.	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars received by the planning authority on the 12 th
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	<p>day of February 2025, and as amended by the appeal received by An Coimisiún Pleanála on the 16th day of April 2025, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity.</p>
2.	<p>The details of the materials, colours and textures of the surface treatment, finishes and materials of all internal roads, footpaths, shared surfaces and public areas shall be agreed in writing with the planning authority prior to the commencement of development.</p> <p>Reason: In the interest of clarity and visual amenity.</p>
3.	<p>Details of the materials, colours and textures of all the external finishes to the proposed dwellings shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: In the interest of visual amenity</p>
4.	<p>The site shall be landscaped in accordance with a comprehensive scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This scheme shall include the following:</p> <ul style="list-style-type: none"> a. A plan to scale of not less than [1:500] showing – <ul style="list-style-type: none"> (i) Existing trees, hedgerows, specifying which are proposed for retention as features of the site landscaping (ii) The measures to be put in place for the protection of these landscape features during the construction period (iii) The species, variety, number, size and locations of all proposed trees and shrubs [which shall comprise predominantly native species].

	<p>(iv) Details of screen planting [which shall not include cupressocyparis x leylandii]</p> <p>(v) Details of roadside/street planting.</p> <p>(vi) Hard landscaping works, specifying surfacing materials, furniture, play equipment and finished levels.</p> <p>b. Specifications for mounding, levelling, cultivation and other operations associated with plant and grass establishment</p> <p>c. A timescale for implementation, including details of phasing.</p> <p>d. All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development [or until the development is taken in charge by the local authority, whichever is the sooner], shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p>Reason: In the interest of residential and visual amenity.</p>
5.	<p>The areas of public open space shown on the lodged plans shall be reserved for such use. These areas shall be landscaped in accordance with a landscaping scheme to be agreed in writing with the planning authority prior to the commencement of development. This work shall be completed before any of the dwellings are made available for occupation unless otherwise agreed in writing with the planning authority.</p> <p>Reason: In order to ensure the satisfactory development of the public open space areas, and their continued use for this purpose.</p>
6.	<p>A schedule of landscape maintenance shall be submitted to, and agreed in writing with, the planning authority prior to occupation of the development. The schedule shall cover a period of at least three years and shall include details of the arrangements for its implementation</p>

	<p>Reason: To provide for the satisfactory future maintenance of this development in the interest of visual amenity.</p>
7.	<p>Prior to commencement of development, all trees, groups of trees, hedging and shrubs which are to be retained shall be enclosed within stout fences not less than 1.5 metres in height. This protective fencing shall enclose an area covered by the crown spread of the branches, or at minimum radius of two metres from the trunk of the tree or centre of the shrub, and to a distance of two metres on each side of the hedge for its full length and shall be maintained until the development has been completed.</p> <p>No construction equipment, machinery or materials shall be brought onto the site for the purpose of the development until all the trees which are to be retained have been protected by this fencing. No work shall be carried out within the area enclosed by the fencing and, in particular, there shall be no parking of vehicles, placing of site huts, storage compounds or topsoil heaps, storage of oil, chemicals or other substances, and no lighting of fires, over the root spread of any tree to be retained.</p> <p>Reason: In the interest of visual amenity and to protect trees and planting during the construction period</p>
8.	<p>All mitigation measures in the EcIA shall be implemented in full.</p> <p>Prior to the commencement of development, the site shall be surveyed for mammals and/or protected species. Any disturbance to badger setts or any other protected species, on site shall be in a manner to be agreed in writing with the planning authority on the advice of a qualified ecologist.</p> <p>Hedges and trees to be removed from the site shall not be felled or removed during the nesting season, (i.e. March 1st to August 31st).</p> <p>Reason: In the interest of biodiversity and nature conservation.</p>
9.	<p>Prior to the commencement of development, a bat survey shall be carried out on the site and the results of the survey shall be submitted in writing to the Planning Authority.</p>

	<p>Prior to the commencement of works, all potential roost features within buildings and trees identified for removal must be inspected by a suitably qualified Ecological Clerk of Works / Bat Ecologist at height with an endoscope and high-powered torch.</p> <p>If a roost is identified in any of the features planned for removal at any stage, works must be halted. Any roosts identified are protected under the provisions of Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021. Damage to such roosts can only occur if a derogation licence under Regulation 54 is obtained prior to any works.</p> <p>Reason: In the interest of nature conservation and wildlife protection.</p>
10.	<p>The developer shall engage a suitably qualified licence eligible archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance/dredging/underwater works and/or construction works. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record [archaeological excavation] and/or monitoring may be required. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service, shall be complied with by the developer. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority. The planning authority and the National Monuments Service shall be furnished with a final archaeological report describing the results of any subsequent archaeological investigative works and/or monitoring following the completion of all archaeological work on site and the completion of any</p>

	<p>necessary post-excavation work. All resulting and associated archaeological costs shall be borne by the developer.</p> <p>Reason: To ensure the continued preservation [either in situ or by record] of places, caves, sites, features or other objects of archaeological interest.</p>
11.	<p>Proposals for an estate numbering scheme and associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all estate and street signs, and house numbers, shall be provided in accordance with the agreed scheme. The proposed name shall be based on local historical or topographical features, or other alternatives acceptable to the planning authority. No advertisements/marketing signage relating to the name of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name.</p> <p>Reason: In the interests of urban legibility and to ensure the use of locally appropriate placenames.</p>
12.	<p>Prior to the commencement of development, the developer shall enter into a Connection Agreement (s) with Uisce Éireann (Irish Water) to provide for a service connection(s) to the public water supply and/or wastewater collection network.</p> <p>Reason: In the interest of public health and to ensure adequate water/wastewater facilities.</p>
13.	<p>Prior to the commencement of any works associated with the development hereby permitted, the developer shall submit a detailed Construction Environmental Management Plan (CEMP) for the written agreement of the planning authority. The CEMP shall incorporate details for the following: collection and disposal of construction waste, surface water run-off from the site, on-site road construction, and environmental management measures during construction including working hours, noise control, dust and vibration control and monitoring of such measures. A record of daily checks that the construction works are being undertaken in accordance with the CEMP shall be kept at the construction site office for inspection by the</p>

	<p>planning authority. The agreed CEMP shall be implemented in full in the carrying out of the development.</p> <p>Reason: In the interest of residential amenities, public health and safety and environmental protection.</p>
14.	<p>A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall include details of arrangements for routes for construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.</p> <p>Reason: In the interest of sustainable transport and safety.</p>
15.	<p>The attenuation and disposal of surface water shall comply with the requirements of the planning authority for such works and services. Prior to the commencement of development, the developer shall submit details for the disposal of surface water from the site for the written agreement of the planning authority.</p> <p>Reason: In the interest of public health.</p>
16.	<p>Public lighting shall be provided in accordance with a scheme which shall be submitted to and agreed in writing with the planning authority prior to the commencement of development. The scheme shall include lighting along pedestrian routes through open spaces and shall take account of trees within the landscape plan. Such lighting shall be provided prior to the making available for occupation of any residential unit.</p> <p>Reason: In the interest of amenity and public safety.</p>
17.	<p>A plan containing details for the management of waste (and, in particular, recyclable materials) within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials within each house plot shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the agreed waste facilities shall be maintained</p>

	<p>and waste shall be managed in accordance with the agreed plan.</p> <p>Reason: To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment.</p>
18.	<p>All the communal parking areas serving the residential units shall be provided with functional electric vehicle charging points, and all of the in-curtilage car parking spaces serving residential units shall be provided with electric connections to the exterior of the houses to allow for the provision of future electric vehicle charging points. Details of how it is proposed to comply with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: In the interest of sustainable transportation.</p>
19.	<p>a. Cycle spaces shall be provided in accordance with the details shown on Drawing No. 1302 PLN 090 – Proposed Site Plan (Sheet 1 of 3) submitted as further information.</p> <p>b. Provision should be made for a mix of bicycle types including cargo bicycles and individual lockers. Details of the layout and marking demarcation of these spaces and the storage facility shall be submitted to and agreed in writing with the planning authority prior to the commencement of development.</p> <p>c. Electric charging points shall be provided at an accessible location for charging cycles/scooters/mobility scooters. Details shall be submitted to and agreed in writing with the planning authority prior to the commencement of development.</p> <p>Reason: To ensure that adequate bicycle parking provision is available to serve the proposed development, in the interest of sustainable transportation.</p>
20.	<p>(a) Prior to the commencement of the development as permitted, the applicant or any person with an interest in the land shall enter into an agreement with the planning authority (such agreement must specify the number and location of each house or duplex unit), pursuant to Section 47</p>

	<p>of the Planning and Development Act 2000, that restricts all relevant residential units permitted, to first occupation by individual purchasers i.e. those not being a corporate entity, and/or by those eligible for the occupation of social and/or affordable housing, including cost rental housing.</p> <p>(b) An agreement pursuant to Section 47 shall be applicable for the period of duration of the planning permission, except where after not less than two years from the date of completion of each specified housing unit, it is demonstrated to the satisfaction of the planning authority that it has not been possible to transact each of the residential units for use by individual purchasers and/or to those eligible for the occupation of social and/or affordable housing, including cost rental housing.</p> <p>(c) The determination of the planning authority as required in (b) shall be subject to receipt by the planning and housing authority of satisfactory documentary evidence from the applicant or any person with an interest in the land regarding the sales and marketing of the specified housing units, in which case the planning authority shall confirm in writing to the applicant or any person with an interest in the land that the Section 47 agreement has been terminated and that the requirement of this planning condition has been discharged in respect of each specified housing unit.</p> <p>Reason: To restrict new housing development to use by persons of a particular class or description in order to ensure an adequate choice and supply of housing, including affordable housing, in the common good.</p>
21.	<p>The development hereby permitted shall be carried out and completed at least to the construction standards as set out in the planning authority's Taking In Charge Standards. In the absence of specific local standards, the standards as set out in the 'Recommendations for Site Development Works for Housing Areas' issued by the Department of the Environment and Local Government in November 1998. Following completion, the development shall be maintained by the developer, in compliance with these standards, until taken in charge by the planning authority.</p>

	<p>Reason: To ensure that the development is carried out and completed to an acceptable standard of construction.</p>
22.	<p>The attenuation and disposal of surface water shall comply with the requirements of the planning authority for such works and services. Prior to the commencement of development, the developer shall submit details for the disposal of surface water from the site for the written agreement of the planning authority.</p> <p>Reason: In the interest of public health and surface water management.</p>
23.	<p>The internal road network serving the proposed development, including turning bays, junctions, parking areas, footpaths, and kerbs, shall comply with the detailed construction standards of the planning authority for such works and design standards outlined in Design Manual for Urban Roads and Streets (DMURS).</p> <p>Reason: In the interest of amenity and of traffic and pedestrian safety.</p>
24.	<p>Prior to the occupation of the development, a Stage 3 Road Safety Audit, including a Final Audit Report for the proposed development, together with associated junctions and internal roads, shall be prepared in accordance with TII's standards shall be submitted for written agreement with the planning authority.</p> <p>Reason: In the interest of traffic and pedestrian safety.</p>
25.	<p>All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development. All existing over ground cables shall be relocated underground as part of the site development works.</p> <p>Reason: In the interests of visual amenity.</p>
26.	<p>Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays.</p> <p>Deviation from these times will only be allowed in exceptional</p>

	<p>circumstances where prior written approval has been received from the planning authority.</p> <p>Reason: In order to safeguard the residential amenities of property in the vicinity.</p>
27.	<p>Prior to commencement of development, a Resource Waste Management Plan (RWMP) as set out in the EPA's Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects (2021) shall be prepared and submitted to the planning authority for written agreement. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.</p> <p>Reason: In the interest of reducing waste and encouraging recycling.</p>
28.	<p>The site development and construction works shall be carried out such a manner as to ensure that the adjoining streets are kept clear of debris, soil and other material and cleaning works shall be carried on the adjoining public roads by the developer and at the developer's expense on a daily basis.</p> <p>Reason: To protect the residential amenities of property in the vicinity.</p>
29.	<p>The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper</p>

	<p>application of the terms of the Scheme.</p> <p>Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.</p>
30.	<p>Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion of roads, footpaths, watermains, drains, open space and other services required in connection with the development, coupled with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.</p> <p>Reason: To ensure the satisfactory completion of the development.</p>
31.	<p>Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the transfer of land in accordance with the requirements of section 94(4) and section 96(2) and 96(3)(a), (Part V) of the Planning and Development Act 2000, as amended, and/or the provision of housing on the land in accordance with the requirements of section 94(4) and section 96(2) and 96(3) (b), (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate has been granted under section 97 of the Act, as amended. Where such an agreement cannot be reached between the parties, the matter in dispute (other than a matter to which section 96(7) applies) shall be referred by the planning authority or any other prospective party to the agreement, to An Bord Pleanála for determination.</p> <p>Reason: To comply with the requirements of Part V of the Planning and</p>

	Development Act 2000, as amended, and of the housing strategy in the development plan for the area.
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I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

. Elaine Sullivan
Planning Inspector

1st August 2025

Form 1 - EIA Pre-Screening

Case Reference	ABP-322316-25
Proposed Development Summary	Residential development of 61 units. See Section 2.0 of Inspectors Report
Development Address	Knockroe, Greystones, Co. Wicklow
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2. <input type="checkbox"/> No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
<input type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road	

development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2)	Class 10(b)(i) – Threshold 500 units

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Form 2 - EIA Preliminary Examination

Case Reference	ABP-322316-25
Proposed Development Summary	Residential development of 61 units. See Section 2.0 of Inspectors Report
Development Address	Knockroe, Greystones, Co. Wicklow
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	<p>The proposed development is for a stand-alone project on a brownfield site of 1.89ha at the edge of the settlement of Greystones. The works will require the demolition of a detached house, timber lodge and associated outhouses and the construction of 61 housing units. The site is surrounded by residential developments of different scale with some newer developments to the north and east. Residential development adjoining the site comprises detached houses on their own sites. The R761 – Kilcoole Road bounds the site to the west.</p> <p>Construction works would involve site clearance and the removal of 32 trees, earthworks and reprofiling of the existing landscape. It would not require the use of substantial resources or give rise to significant risk of pollution or nuisance. The nature of the development does not pose a risk of major accident and/or disaster, and the development is not vulnerable to climate change. It presents no risk to human health.</p>
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	<p>The proposed development is on a brownfield site on the edge of an urban development. The site comprises land that is currently in residential use with a large part of the site left undeveloped and overgrown.</p> <p>The site does not have any conservation designations and is not located within or adjoining an NHA, pNHA, SAC or SPA. There are no Protected Structures or National Monuments within the site. There are no protected views or prospects across the site and the landscape has not been designated for protection or conservation.</p>
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative	<p>Having regard to the nature of the proposed development, which includes landscaping and residential development, its location on the edge of an urban settlement, removed from sensitive habitats and conservation sites, likely limited magnitude and spatial extent of effects, and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act</p>

effects and opportunities for mitigation).	
Conclusion	
Likelihood of Significant Effects	
There is no real likelihood of significant effects on the environment.	EIA is not required.
There is significant and realistic doubt regarding the likelihood of significant effects on the environment.	
There is a real likelihood of significant effects on the environment.	

Inspector: _____ **Date:** _____

DP/ADP: _____ **Date:** _____

(only where Schedule 7A information or EIAR required)

Appendix 1 - AA Screening Determination

Test for likely significant effects

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics Case File ABP-322316-25	
Brief description of project	<p>Planning permission is sought for a residential development of 61 units comprising, 24 x 3-bed houses, 5 x 2-bed houses, 16 x 1-bed ground floor apartments and 16 x 2-bed duplex units with all associated works. The development would be connected to the public mains water, foul water and surface water drainage systems.</p> <p>See Section 2.0 of Inspectors Report for full description.</p>
Description of development site characteristics and potential impact mechanisms	<p>The subject site has a stated area of 1.896 ha and is a brownfield site on the outskirts of Greystones. The site is bounded to the north and east by detached houses on their own site. To the west the site is bounded by the R761 – Kilcoole Road with the housing development of Knockroe to the south. The Kilquade Road junction is to the north-west of the site with the Farrankelly housing development on the opposite side of the road. New housing development has been constructed to the north-east of the site.</p> <p>There are two houses in place on the site, one of which is inhabited. The remainder of the site is vacant and overgrown.</p> <p>The closest European sites are the Murrough SPA (1.8km to the east) and the Murrough Wetlands SAC (1.7km to the east). The Glen of the Downs SAC is approximately 2.3km to the west of the site.</p> <p>There are no surface water bodies within the site. The nearest watercourse is the Three Trout Stream, located approximately 800m to the north of the site boundary. This stream outfalls to the marine environment off the Greystones coastline immediately adjacent to the Murrough SPA and 2.3km from the Murrough SAC.</p> <p>An Outline Construction & Waste Management Plan was prepared for the development. The proposed development would involve standard construction methods which would result in noise, disturbance and emissions to air from machinery and plant, and emissions to surface and ground water because of runoff from construction activities.</p>
Screening report	Yes – A Report to Inform Screening for Appropriate Assessment was submitted.

Natura Impact Statement		No		
Relevant submissions		The issue of AA was not raised in third party submissions or in submissions from prescribed bodies.		
Step 2. Identification of relevant European sites using the Source-pathway-receptor model				
The AA Screening Report considered all European sites within a 15km radius of the development site. Using the principle of Source-Pathway-Receptor model, no direct connections between the site and any European sites were identified. There is an indirect connection from the site to the Murrough SPA and SAC via the surface water network and the Three Trout Stream. Although the connection is weak, the potential impact of the development on the European sites is considered below.				
European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
The Murrough SPA (Site Code 004186), (c. 1.7km to the east of the subject site).	S.I. No. 298/2011 - European Communities (Conservation of Wild Birds (The Murrough Special Protection Area 004186)) Regulations 2011. CO004186.pdf (NPWS Conservation Objectives accessed on the 31/07/2025)	1.7km overland	An indirect connection exists from the site to the SPA via the Three Trout Stream which is approximately 800m from the northern site boundary and which outfalls to the marine environment immediately adjacent to the Murrough SPA, at a hydrological distance of c. 2km away.	Y
The Murrough SAC (Site Code 002249) (c. 1.8km to the east of the site).	S.I. No. 622/2017 - European Union Habitats (The Murrough Wetlands Special Area of Conservation 002249) Regulations 2017 CO002249.pdf (NPWS Conservation Objectives accessed on the 31/07/2025)	1.8km overland	An indirect connection exists from the site to the SPA via the Three Trout Stream which is approximately 800m from the northern site boundary and which outfalls to the marine environment immediately adjacent to the Murrough SPA, at a hydrological distance of 2km away.	Y

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

- (a) There would be no direct impacts on the SPA or the SAC during the construction of operational stages of the development. Indirect impacts would be limited to noise and/or disturbance during the construction phase and emissions to air and water during the construction and/or operational phase.
- (b) The distance between the subject site and the SPA and SAC would prevent any significant impacts from noise and disturbance and from emissions to air such as dust or hydrocarbons. Indirect impacts would be limited to uncontrolled pollutants in surface water runoff entering the existing drainage system and flowing into the SAC during the construction stage of the development.

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
<p>Site 1: The Murrough SPA (Site Code 004186), (c. 1.7km to the east of the subject site).</p> <p>QI list: Red-throated Diver (Gavia stellata) [A001] Greylag Goose (Anser anser) [A043] Light-bellied Brent Goose (Branta bernicla hrota) [A046] Teal (Anas crecca) [A052] Black-headed Gull (Chroicocephalus ridibundus) [A179] Herring Gull (Larus argentatus) [A184] Wigeon (Mareca penelope) [A855] Little Tern (Sternula albifrons) [A885] Wetland and Waterbirds [A999]</p>	<p>Direct: None</p> <p>Indirect – Construction: Localised temporary impacts on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.</p> <p>Indirect - Operational: Surface water will be attenuated by integrated SUDs system and hydrocarbon filtration system.</p>	<p>The ecological field study did not identify any of the qualifying interests on the site and there is no potential for ex-situ effects arising from the development.</p> <p>The distance between the site and the SPA will negate any effects arising from noise, disturbance, dust or emissions into the air.</p> <p>There is a low risk of surface water runoff from construction reaching sensitive receptors or wetland habitats. Given the minimum distance from the proposed development site to the SPA, the distance of the connection from the main construction site, the small scale of the proposed development and the fact that surface water drainage will be directed to an existing public surface water network once the internal drainage connections will be in place, pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately settle within the surface water drainage network and the Three Trout Stream. Foul water will be discharged to the existing public network, where it will be treated under license prior to discharge to the Irish Sea.</p>

<p>Site 2: The Murrough SAC (Site Code 002249) (c. 1.8km to the east of the site).</p> <p>Annual vegetation of drift lines [1210] Perennial vegetation of stony banks [1220] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210] Alkaline fens [7230]</p>	<p>Direct: None</p> <p>Indirect – Construction: Localised temporary impacts on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.</p> <p>Indirect - Operational: Surface water will be attenuated by integrated SUDs system and hydrocarbon filtration system.</p>	<p>There is a low risk of surface water runoff from construction reaching sensitive receptors or wetland habitats. Given the minimum distance from the proposed development site to the SPA, the distance of the connection from the main construction site, the small scale of the proposed development and the fact that surface water drainage will be directed to an existing public surface water network once the internal drainage connections will be in place, pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately settle within the surface water drainage network and the Three Trout Stream. Foul water will be discharged to the existing public network, where it will be treated under license prior to discharge to the Irish Sea.</p>
	<p>Likelihood of significant effects from proposed development (alone): - No</p>	
	<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? - No</p>	
	<p>Possibility of significant effects (alone) in view of the conservation objectives of the site – No</p> <p>I note that specific conservation objectives for Greylag Goose and Light-bellied Brent Goose in the SPA and for all QIs in the SAC relate to the 'restoration' of the qualifying interest. The proposed development would not compromise the objective of restoration or make restoration more difficult by virtue of the scale of the project, its location and separation distance from the SAC and the location of the relevant qualifying interests.</p>	
<p>Step 4 Conclusion</p>		
<p>I conclude that the proposed development (alone) would not result in likely significant effects on The Murrough SPA (Site Code 004186), or on the The Murrough SAC (Site Code 002249). The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). No further assessment is required for the project. No mitigation measures are required to come to these conclusions.</p>		
<p>Screening Determination</p> <p>Finding of no likely significant effects</p>		

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on The Murrough SPA (Site Code 004186), or on the The Murrough SAC (Site Code 002249) in view of the conservation objectives of the sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- Scientific information provided in the Screening report.
- Distance from and weak indirect connections to the European sites.
- No potential for ex-situ impacts.
- Possible impacts identified would not be significant in terms of site-specific conservation objectives for The Murrough SPA (Site Code 004186), or on the The Murrough SAC (Site Code 002249) and would not undermine the maintenance of favorable conservation condition or delay or undermine the achievement of restoring favorable conservation status for those qualifying interest features of unfavorable conservation status.

No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.

Appendix 2 – Water Framework Directive Screening

The subject site is located on the southern outskirts of Greystones, Co. Wicklow. It is a brownfield site at its western extent and a greenfield site to the west. There are no waterbodies within or traversing the site. The site is within the Ovoca-Vartry Water Framework Directive (WFD) Catchment and the Kilcoole Stream_101 WFD Sub-basin Catchment. The WFD status for the Kilcoole Stream is 'Poor' and is being monitored.

The proposed development comprises site clearance and demolition works to remove one two-storey dwelling, one timber cabin and associated outbuildings and the construction of 61 residential units, (29 no. houses and 32 no. duplex units) with all associated works. The development would be connected to the public mains water, surface water and foul water drainage services.

No water deterioration concerns were raised in the planning appeal.

I have assessed the proposed development for the construction of 61 residential units on the outskirts of the urban development of Greystones and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

The reason for this conclusion is as follows:

- The nature of the works and the small scale of the development proposed.
- The location of the site in an urban area and the distance from nearest Water bodies.
- The lack of hydrological connections to/from the site.

Conclusion

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.