



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

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## Topic

LAP - Proposed Material Amendments No 26 Submission

## Submission

I am a resident and landowner directly adjoining the lands at Bellevue Demesne that are proposed to be rezoned under Material Alteration No. 26. My property shares a boundary with the site purchased by Éire Óg GAA Club, who are seeking to bring these lands inside the LPF boundary and zone them AOS – Active Open Space under a new Specific Local Objective (SLO 12 – Bellevue Hill).

Given the immediate proximity of my home to this land, the proposed alteration will have a direct and significant impact on my privacy, environment, water resources, and overall residential amenity.

For these reasons, I object to the adoption of Proposed Material Alteration No. 26.

Core Grounds for Objection:

1.Noise, lighting and intensification risk.

While we have been told that the proposed Éire Óg site will be used “only for training sessions”, once a site is zoned AOS, the reality is that usage can expand over time. Examples across County Wicklow and Dublin show how AOS lands can evolve into:

- Full training complexes
- Floodlit pitches
- Car parks
- Clubhouse and ancillary buildings
- Match hosting and events
- Night-time and weekend activity

My home is immediately behind the site. Any increase in activity would result in:

- Persistent noise spill (whistles, shouting, coaching, training drills)
- Light pollution, particularly if floodlights are ever installed
- Significant evening and weekend disturbance
- Loss of privacy and peaceful enjoyment of my home and garden

Nothing in SLO 12 currently guarantees that floodlighting or night-time activities will never occur. Once zoned, that door is open.

## 2. Water supply and water table risk

This is a major concern and one that has not been assessed properly. The immediate area relies on a shared groundwater table and limited supply capacity. Éire Óg's intended use means:

- Large cohorts of players arriving multiple evenings per week
- High water consumption from showers
- Increased demand that cannot be supported locally
- A likely requirement to extend mains water infrastructure up Bellevue Hill, given the inadequacy of the existing water table for such intensive use

This contradicts sustainable planning principles. The existing low-capacity, semi-rural water network is not designed to support a high-usage sports facility.

## 3. Contamination and chemical risk to groundwater

The site sits on the same local aquifer that supplies multiple homes, including mine. I have serious concerns about:

- use of fertilisers
- Pesticides
- Herbicides
- Fungicides
- Lime, growth enhancers, or pitch-maintenance chemicals
- Diesel or oil runoff from maintenance machinery

Any application of these substances, given the land is higher than mine poses a clear contamination pathway into the groundwater. There is no hydrological assessment in the LPF documentation addressing this. There is no risk assessment on groundwater pollution.

There is no guarantee that Éire Óg will not use chemicals to maintain grass surfaces. This is unacceptable in an area dependent on local groundwater.

## 4. Biodiversity, ecology and habitat loss

The lands at Bellevue Hill are degraded fields — they are part of a sensitive ecological corridor feeding into the Glen of the Downs SAC/pNHA system. The site contains:

- Mature hedgerows

- Wet grassland
- Scrub and small woodland pockets
- Habitat for foxes, badgers, bats, birds, pollinators and amphibians
- A watercourse and drainage patterns that support downstream biodiversity

Zoning this as AOS and permitting the infrastructural works required for pitches (cut-and-fill, drainage, levelling) puts all of this at risk. The proposed SLO 12 wording around hedgerow retention ("insofar as is possible") is too weak and provides no real protection.

#### 5. Road safety, access and cumulative impact

Bellevue Hill is already a narrow, steep, constrained road with:

- No safe pedestrian infrastructure, in fact the road is not wide enough for 2 large vehicles at certain pinch points on the road
- Tight visibility
- NO parking
- Existing traffic pressure due to the 2 new developments along Bellevue Hill

Bringing hundreds of players and parents into this area several times a week is incompatible with the character and carrying capacity of the road. The footpath requirement in SLO 12 is not enough. Even with a footpath, the geometry of the road and the proximity to the Glen of the Downs make this unsuitable for high-frequency sporting activity.

#### 6. Risk of precedent and zoning creep

My concern is straightforward: once you create an AOS block here, future Councils or private applicants may seek to extend, intensify, or partially rezone it. The risk is real, evidenced and already occurring elsewhere in this LPF. Once the boundary moves, it rarely moves back.

Material Alteration 26 is inconsistent with

- Wicklow County Development Plan
- Green infrastructure protection
- Biodiversity and habitat conservation
- Protection of rural landscape character
- Sustainable water resource management
- National Biodiversity Action Plan 2023–2030
- Mandates avoidance of unnecessary habitat loss
- Requires strengthening of ecological networks

EU Habitats Directive prohibits deterioration of habitats supporting designated sites. It requires screening for any project likely to have ecological impact. None of these points have been adequately addressed.

Based on all of the above, I request you do NOT adopt Proposed Material Alteration No. 26. Leave the land outside the LPF boundary and retain its current rural/natural status.

If the Council refuses this position, the zoning should be changed to Natural Open Space (or equivalent) with explicit prohibitions on:

- Floodlighting
- Pitches or hard-surfaced sports facilities
- Chemical treatment of grass
- Car parks or built structures
- Night-time use

-Any activity generating noise beyond standard daytime amenity levels

plus should require:

-a full independent ecological and hydrogeological assessments

-Longitudinal groundwater monitoring

-Strict hedgerow and tree protection with no loopholes

-An enforceable no-intensification clause

Anything less risks irreversible damage to the environment, water supply, and residential amenity.

I fully support local sports and community activity, but this proposal is in the wrong location, lacks the environmental and hydrological assessments required, fails to safeguard residential amenity, and introduces unacceptable risks to the water table, biodiversity and rural character of the area. For these reasons, I urge the Council not to adopt Material Alteration No. 26.

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