



Draft Blessington Local Area Plan Submission - Report

Who are you:	Agent
Name:	Kelland Homes
Reference:	DBLESSLAP-101833
Submission Made	December 11, 2024 10:22 AM

Topic

Housing Development

Submission

See attached

Map



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Site Description:

Lands at Santryhill, Blessington

File

24143 Santry Hill_Draft BLAP_Sub 11122024.pdf, 0.64MB

Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96

Our Ref. 24143

11 December 2024

Re: Draft Blessington LAP – Public Consultation
Kelland Homes Lands at Santryhill, Blessington

Dear Sir/Madam,

We, Stephen Little & Associates, Chartered Town Planning and Development Consultants, 26/27 Upper Pembroke Street, Dublin 2, are instructed to make this formal submission on behalf of our client Kelland Homes, [REDACTED]

This submission is made in respect of the public consultation stage of the Draft Blessington Local Area Plan, which ends 11th December 2024.

We trust that the planning authority will have regard to the contents of this submission, set out below. We would respectfully request that all correspondence regarding same is sent to this office.

Yours faithfully,



Eleanor Mac Partlin

STEPHEN LITTLE & ASSOCIATES

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1 INTRODUCTION

Kelland Homes has developed a strong reputation as home builders, evidenced by a number of well-established residential developments throughout the Greater Dublin Area.

Kelland Homes are seeking to make a valuable contribution to the delivery of high quality residential development at their lands at Santryhill, appropriate to the status of Blessington as a self-sustaining town. Their lands were hitherto zoned residential (R1) for this purpose in the previous Blessington LAP. Neither Wicklow County Council nor An Bord Pleanála objected in principle to previous residential development proposals at these lands on grounds of Core Strategy or housing allocation for Blessington.

Kelland Homes is extremely disappointed that the Draft Blessington LAP has effectively down zoned its lands to 'RN2 – New Residential Priority 2', which places significant restrictions on the development potential of the lands during the life of the LAP. This is difficult to reconcile in the context of the Blessington Inner Relief Road having been recently granted under ABP-319657 (11 September 2024), which can provide access to the site via its junction with the N81, and the ability of the site to be connected to the public water and waste water network and Blessington Wastewater Treatment Plant. There have also been recent planning permissions for similar development in Blessington, which have not been deemed to be in conflict with the Core Strategy or housing allocation for Blessington. We discuss these matters further below in this submission.

Kelland Homes is seeking the reversion of the land use zoning objective for its land at Santryhill to RN1 – New Residential Priority 1.

2 SUBMISSION REQUEST & JUSTIFICATION

This submission seeks the amendment of the Draft Blessington LAP to reverse the proposed change to the land use zoning objective for our Client's land at Santryhill from 'RN2 – New Residential Priority 2' to 'RN1 – New Residential Priority 1'.

The submission request is considered reasonable in the context of:

- Increased frequency of 'work from home' since Covid-19 changed the nature of working patterns and the need for more housing outside Dublin City.
- The scale of the ongoing housing crisis, in particular affecting the Greater Dublin Area.
- The publication of the Draft National Planning Framework and agreement of housing targets amounting to 303,000 homes nationwide from 2025-2030 (equivalent to 50,500 new homes per annum).
- Targeting 50% of future population growth in the 5 cities, and 30% of all new homes within built up settlements beyond the 5 cities and their suburbs.
- The potential of the site to support the delivery of the BIRR connection to the N81, or part thereof.
- The enhanced frequency of Dublin Bus service to Blessington, connecting with Tallaght and Dublin City Centre and with Luas Red Line.
- There are sewer connections within the site for foul and surface water. There is a watermain in the immediately neighbouring Woodleigh development. All of these services are taken-in-charge by Wicklow County Council and available to service development at the Santryhill site.
- The lack of other environmental constraints to the immediate development of the site (e.g. flood risk, ecological sensitivity, etc)
- The potential for an acceptable housing scheme at appropriate scale and density to be delivered at this site, subject to successfully addressing previous design based refusal reasons, given the positive nature of pre-planning consultation with the planning authority in this respect to date.

Further supporting justification for the proposed change of zoning is set out in sections below.

3 SUBMISSION LANDS

The submission site (c.1.8 ha) is located less than 1km to the north of Blessington town centre, fronting the N81 and the corridor of the permitted Blessington Inner Relief Road (BIRR). The town provides a range of retail, commercial, community and transport services, within easy reach of the site. The site lies immediately adjacent to the Woodleigh housing estate and a mixed-use Blessington Business Park.

Blessington is served by metropolitan Dublin Bus. The NTA and Dublin Bus recently announced that the frequency of existing bus route (no.65) serving Blessington would increase by approximately 20% from August 2024 and a new service (no.65A) would be introduced serving Blessington and Tallaght (and connectivity to Luas and other city bus routes) for weekdays.

From a strategic planning perspective, Blessington is identified as a self-sustaining town, located within the 'Core Region' or the 'peri-urban hinterlands' within the commuter catchment of Dublin, as defined by the Regional Spatial and Economic Strategy for the East and Midlands.

The site lies within the boundary of the Draft Blessington Local Area Plan 2022 – 2028. The Draft Plan provides for local growth in residential, employment and service functions, through enhancing the built environment, water services, public transport links and capacity for development in Blessington.

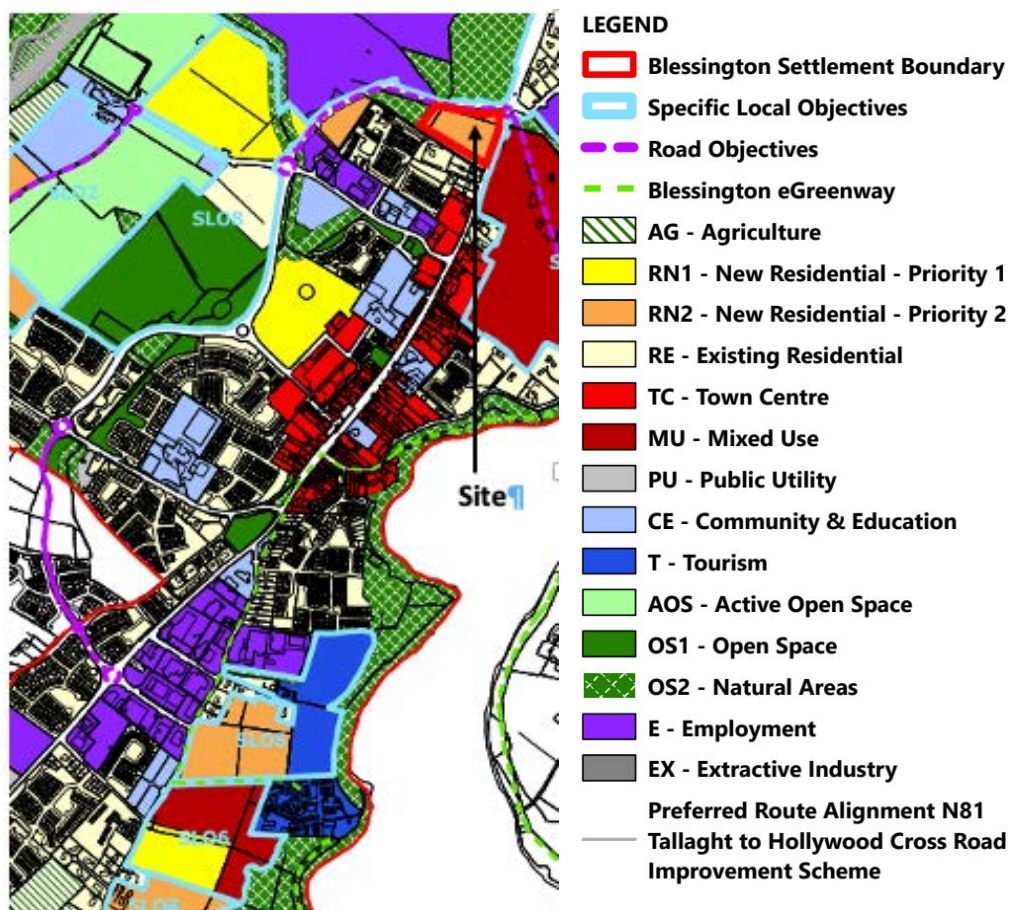


Figure 1. Extract from Blessington LAP 2022-2028 draft zoning map with submission site identified (SLA red line overlay).

Sequentially, the site at Santryhill immediately neighbours existing residential and commercial use to the west and is only 12 minutes walk from Blessington town centre. Having regard to BLESS OP8 objective, which aims to introduce cycle lanes, pedestrian routes and redevelop the town centre, it would be possible to connect the site via Woodleigh and the N81 via active travel modes (walking & cycling). This is discussed further in Section 7 below. We would submit that the Santryhill site is a shorter distance from the Blessington town centre than the land zoned RN1 at Oak Drive and a similar distance from the town centre as the lands zoned RN1 at Burgage More.

4 PLANNING HISTORY SUMMARY

4.1 WCC Reg. Ref. 21/1396 – Santryhill Site

On 22 November 2021, planning permission was sought for the construction of 56 dwellings (36no. 2 storey and 20no. duplex/apartment units). The proposed development included access onto the N81 road, site development works and ancillary works with provision for a future access from the BIRR link road.

An Bord Pleanála upheld the Planning Authority's decision to refuse permission, under ABP-312825-22 (23 June 2023). However, it should be noted that:

Refusal Reasons no. 1 and no. 2, relating to **BIRR**, have since been addressed with ABP having granted permission for BIRR under ABP-319657 (11 September 2024). The BIRR alignment can provide access to the Santryhill site via its junction with the N81. Pre-planning consultation has commenced on a revised scheme that also seeks to resolve the urban design considerations in respect of achieving a more successful interface between the design and orientation of the proposed housing in relation to the N81 and BIRR. It is expected the matter can be resolved.

Refusal Reason no. 3 relating to density can be resolved. Pre-planning consultation has commenced on a revised proposal that achieves the minimum density range of the Sustainable Residential Development and Compact Settlements Guidelines (40-80 dw/ha) for edge of centre sites such as this.

Refusal Reason no. 4 requires an archaeological impact assessment, which can be readily undertaken.

Refusal Reason no. 5 related to wastewater infrastructure and lack of *'sufficient information to assess the impact of increased loading to the existing wastewater infrastructure entering into and running through the Woodleigh Estate, it is considered that the proposed development would be prejudicial to public health'*. Detail on the capacity of the existing wastewater and watermains infrastructure and any design mitigation measures, can be agreed with Irish Water prior to making a future application. It is expected that an Irish Water Confirmation of Feasibility will be forthcoming.

In respect of the Board Inspector's inconclusive appropriate assessment screening, further bird and habitat survey analysis is being carried out on site and can be provided at application stage to confirm that the proposed development of this site will not have any impact on the special conservation interest of Natura sites within the zone of influence of the site. We note that this has been the case for neighbouring lands.

4.2 WCC Reg. Ref. 24/60544 – Nugent Lands at Santryhill

On 9 September 2024, planning permission was sought for 13no. housing units, connected to existing services at Woodleigh Park, including a pedestrian access from Woodleigh Park to the N81.

There is a positive indication that the planning authority is minded to grant permission, subject to being satisfied on the following Further Information items raised on 1 November 2024. In this case, the planning authority is seeking further information on (1) the quantum of earthworks required, (2) details of the proposed open space, (3) a revised design statement, (4) an engineering report with analysis of the existing Woodleigh estate roads, footpaths and ability to safely cater for additional traffic, (5) an engineering report to provide details of nature based SUDS and clarity on storm and foul water sewers, (6) a revised archaeological statement, (7) Part V details and (8) material finishes to buildings.

As the planning authority should not seek further information where there is a fundamental objection in principle to the proposed development, it is expected that these are all matters that can be resolved. It is noted that no issue in respect of the Core Strategy or housing allocation for Blessington has been raised.

4.3 WCC Reg. Ref. 22574 – Burage Manor Lands

On 27 May 2022, planning permission was sought for the construction of 21no. residential units in a mix of houses, duplex and apartments.

The decision by Wicklow County Council to grant planning permission on 18 January 2023 was appealed. An Bord Pleanála upheld the grant of permission, under Ref ABP-315792-23 on 01 May 2023.

The main issues relating to the appeal were principle of development, design approach, transportation, ecology, EIA considerations and Archaeology. The Board was satisfied the development would be in accordance with proper planning and sustainable development of the area, noting that the proposal is in accordance with the land use zoning. No contravention of the Core Strategy or housing allocation for Blessington was raised.

4.4 Planning Precedent

With respect to the Core Strategy and the phasing provision of the County Development Plan 2022-2028, in the two cases at other nearby sites in Blessington the Core Strategy housing allocation has not been an impediment to permission. No requirement for material contravention was raised, demonstrating that there remains capacity in Blessington to absorb modest development in the same built up area close to the town centre.

We also highlight that the Wicklow Development Plan 2022-2028 provides for a flexible application of housing targets to zoned land stating its aim *‘to ensure flexibility in the event of an increase in housing targets during the timeline of this plan’*. This acknowledges that the Plan was prepared in the context of the NPF 2018 and does not take account of the Draft NPF 2024 and recent national housing targets. Pending the publication of the NPF implementation roadmap and the translation of same into the RSES and local statutory development plans, we would submit that the housing allocation of 519 dwellings to Blessington is overly conservative.

We further submit that it would be unreasonable to continue to take a conservative approach to housing allocation given the current housing crisis and the clear lack of housing evident within Blessington as identified by the outward exodus of those at household forming age (see Section 5.1.2 below). The time it will take for the County Development Plan and thus the LAP to account for adjusted housing allocation on foot of the NPF and RSES amendments is likely to result in increased strain on the existing housing stock in Blessington to cater for pent up, ongoing and projected demand to 2030 to cater for young households.

The submission site offers an opportunity to immediately provide much needed housing within the built up area of Blessington, close to the town centre that is consistent with other recent housing permissions at similar sites in the town.

5 REVIEW OF THE DRAFT BLESSINGTON LAP IN RESPECT OF THE SUBMISSION LANDS

5.1 Core Strategy

5.1.1 Settlement Strategy

Section A2.1 ‘Core Strategy’ of the Draft LAP continues to identify Blessington as a Level 3 settlement (i.e. ‘self-sustaining growth town’) in the County settlement hierarchy.

As noted previously, the submission site (c.1.8 ha) is located less than 1km to the north of Blessington town centre, which provides a range of retail, commercial, community and transport services. The changed nature of working patterns with increased frequency of ‘work from home’ should also be considered in respect of the need to deliver housing within Blessington. Thereafter it is served by Dublin Bus to Tallaght and the City Centre, with connectivity to Luas at Saggart and Tallaght.

5.1.2 Population and Housing Targets

Section A2.4 (Population and Housing) of the Draft LAP confirms the proposed population and housing targets for Blessington are derived from the County Development Plan 2022-2028 as follows: -

A2.4 Population and Housing

The population and housing targets for Blessington³ are provided in the Core Strategy of the County Development Plan 2022-2028, expressed as growth from 2016 to 2031.

Table 2 Blessington

Table 2.1 Population Targets

LEVEL 3	2016 Census	Q2 2028 CDP Target	2031 CDP Target
Blessington	5,234	6,145	6,313

Table 2.2 Housing Unit Targets 2031

LEVEL 3	2016 Housing Stock	Q2 2028 CDP Target	2031 CDP Target	Growth 2016-2031
Blessington	1,914	2,352	2,433	519

Figure 1: Extract of table 2 from Draft Blessington LAP 2025 (overlay in red by SLA).

It is noted that the County Development Plan was prepared and adopted in advance of the more recent publication of the Draft National Planning Framework in July 2024 (updated November 2024) and in advance of any NPF Roadmap that would identify how the housing growth targets to 2030 are to be allocated through the RSES and statutory development plans.

As such, the growth target allocation of 519no. units takes no account of the Draft NPF (2024) and Implementation Roadmap, and yet is proposed to remain the growth target for the life of the Blessington LAP to 2031. This notwithstanding the proximity and accessibility of Blessington to employment centres at City West and Tallaght, in the context of a long running housing crisis where current and pent up demand for housing should also be a consideration factor.

An analysis of existing 2016 and 2022 CSO Census data highlights the movement of people who are likely to be starting a household, aged 20-29 and 30-39, outwards from Blessington. In 2016 there was 502 people aged 20-29, by 2022 this had declined 3.2% to 486. In 2016 there were 1,020 people aged 30-39 and by 2022 this had decreased to 713 in 2022, a significant decrease of 30.1%. The census data shows clearly a significant number of people leaving Blessington at the age at which they would start a household, likely due to a lack of housing availability within the area.

Noting that the number of people aged 10-19 has increased from 771 in 2016 to 1,045 in 2022, an increase of 73.8%, it is likely that the exodus of population at household formation stage will continue during the life of the Blessington LAP in the face of a continued housing shortage.

The Wicklow Development Plan recognises Blessington as a Level 3 settlement, these are towns with are designated 'self-sustaining growth towns' and are 'towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. It is proposed that Blessington will not continue to be self-sustaining unless measures are taken to reduce the outward movement of the population at household formation age. One such measure is to ensure that there is sufficient quantum of zoned residential land that is available for immediate development (i.e. zoned RN1).

The lands at Santryhill can accommodate the development of high quality neighbourhood dwellings, at a sustainable residential density of 35-40 dw/ha, that can integrate well with the established pattern of urban development at Blessington, at this urban infill site neighbouring mixed development and being within 1km of the town centre.

The residential development of the lands can deliver or make financial contribution (in the form of Development Contributions) towards the delivery of public infrastructure that improves access to and around the town and pedestrian and cycle permeability through the town. It also supports the viability of

local businesses and services, which serve to strengthen the town centre. An enhanced Metropolitan bus services Blessington, with increased frequency announced for the no.65 and 65A routes in August 2024.

The site is serviceable and of broadly equivalent sequential and development merit compared to other sites zoned 'RN1' in the Draft LAP. The phasing of the Draft LAP should not prevent the sustainable residential development of the Santryhill site.

5.2 Sustainable Movement and Transportation

Sequentially the submission site is well connected via the N81 while final design has been approved for the BIRR link road to the northern boundary of the site under ABP – 319657 – 24. The site is accessible from the N81 road leading into Blessington town centre while the BIRR will additional capacity following completion.

The Blessington Draft LAP aims to ensure the town centre is an attractive place to live in, work in and to visit, easy to get to, easy to walk and cycle within and is a competitive place to conduct business. The proposed development is situated 1km north-east of Blessington town centre, the proposed site offers the potential for a residential scheme that would encourage active transport given that it takes 10-15 minutes to walk from the Santryhill site into Blessington town centre. The site also offers the ability to promote other means of active transport such as cycling, which will help reduce reliance on private transport and therefore reducing carbon emissions. This development would provide a housing scheme which can contribute to an attractive town centre in line with the Blessington Draft LAP.

Objective BLESS OP8 aims to redevelop a mixed use town centre infill development which will include pedestrian and cyclist routes. We note OP8 is located 200m south of the proposed Santryhill site, or a 3 minute walk, and therefore would be viable to integrate Santryhill with the proposed redevelopment of OP8, actively providing sustainable transport routes and aligning with the aims of the Blessington Draft LAP.

5.3 Water and Drainage Infrastructure

There are established sewer connections in place for both foul and surface water, available to serve the Santryhill submission site.

By comparison, Doran's Pit, which is marked as being serviced in the Draft LAP, does not have any existing sewer connections and would likely require a wastewater pumping station. We note also that the lands located at 'Doran's Pit' are subject to Specific Local Objective 4 (section 6.2 of this memo below). This SLO (Specific Local Objective) includes the following as a requirement for any development proposals within its boundary: -

- *"The delivery of the road objective linking the N81 to Kilbride Road/Knockieran Bridge. The layout of this road should form an arm off the planned roundabout at the northern end of the Blessington Inner Relief Road, while the road from Blessington Mart should terminate in a junction onto this road objective, with the exact layout to be agreed with the Planning Authority. **Permission will not be considered for any development within these SLO unless accompanied by delivery of this road in full before any development is occupied / brought into use.**"*
- *"The development of at least c.3.3 ha of active open space / sport uses and ancillary facilities on the north-eastern side of the road objective in the vicinity of the N81. The exact type and layout of active open space uses shall be agreed with the Planning Authority. **Permission for residential development within this SLO will not be considered unless this sport ground will be completed and available for use upon the occupation of the 1st house.**"*

The 'Doran's Pit' lands are indicated as 'serviced', 'Urban Neighbourhood' and 'Priority 2', however are subject to 'SLO4' requiring the delivery of BIRR 'in full' and the delivery of the sports grounds. The lands at Santryhill are not constrained in this way. It would be possible to extend the approved BIRR from the N81 junction to provide vehicular, cycle and pedestrian access to the site.

We would submit that our client's lands at Santryhill are more readily serviceable, accessible and should take precedence in respect of sequential development. As land that is immediately ready to be developed, subject to planning permission, we request the lands be zoned 'RN1' as priority one lands.

6 CONCLUSION

For all of the reasons set out above, this submission seeks a change of zoning from 'RN2 – New Residential Priority 2' to 'RN1 – New Residential Priority 1' at the submission lands at Santryhill, within the Blessington Draft LAP development boundary. The lands offer the opportunity to provide much needed housing to the Blessington area.