



Draft Blessington Local Area Plan Submission - Report

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Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Tuesday, 10th December 2024

Dear Sir / Madam,

RE: ENGAGEMENT IN RESPECT OF THE *DRAFT BLESSINGTON LOCAL AREA PLAN 2025*

Thornton O'Connor Town Planning¹ have been retained by Embankment Plastics² to prepare this engagement in respect of the *Draft Blessington Local Area Plan 2025*. It pertains to lands of approximately 1.334 Ha at Burgage More to the southwest of Blessington Town Centre. A detailed and cogent Submission in respect of same was made at the Pre-Draft Consultation Stage for the *Blessington Local Area Plan*. We note that the subject lands remain zoned 'E: Employment' in the *Draft Blessington Local Area Plan 2025*. In light of this, we respectfully request that the Submission made at the Pre-Draft Consultation Stage is reconsidered.

The Pre-Draft Consultation Stage Submission, which is appended hereto, sought the rezoning of the subject lands to 'R1: New Residential'. On behalf of our Client, we respectfully request that the robust justification put forth for its rezoning in that Submission is considered at this stage of the making of the *Blessington Local Area Plan*. The rezoning of the subject lands at Burgage More, as comprehensively set out in the Pre-Draft Consultation Stage Submission, has the potential to play a key role in the consolidated development of Blessington where there continues to be an acute shortage of housing. The continued vacancy of a substantial portion of the subject lands into the future is not in the interests of proper planning and sustainable development.

We trust that the points made will be duly considered and look forward to reviewing the content of the *Blessington Local Area Plan* in due course.

Yours faithfully,



Sadhbh O'Connor
Director
Thornton O'Connor Town Planning

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14

² [REDACTED]



THORNTON O'CONNOR
TOWN PLANNING

Submission to Wicklow County Council

In Respect of the Pre-Draft Consultation Stage
for the *Blessington Local Area Plan*

On Behalf of Embankment Plastics

March 2024

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Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town

Monday, 25th March 2024

Dear Sir/Madam,

RE: Submission in respect of the Pre-Draft Consultation Stage for the Blessington Local Area Plan

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹, in association with ALTU Architects², have been retained by Embankment Plastics³ to prepare this Submission to Wicklow County Council in respect of the Pre-Draft Consultation Stage for the *Blessington Local Area Plan*.

1.1 Purpose of this Submission

The purpose of this Submission is to reflect upon the provisions of the *Blessington Local Area Plan 2013–2019*, to consider the content of the *Wicklow County Development Plan 2022–2028* and to review activity in the settlement area in order to extract beneficial insights. This is in order to provide an informed series of recommendations in relation to the forthcoming *Draft Blessington Local Area Plan*.

Specifically, this Submission seeks to provide a robust justification to support the appropriate zoning of land in the settlement. In particular to rezone lands at Burgage More from E: Employment to R1: New Residential.

1.2 Location of the Lands Subject of this Submission

The subject lands are comprised of 1 No. plot, located approx. 1 km. southwest of Blessington Town Centre. The area of the subject site is 1.334Ha. It is bordered on the northeast by Embankment Plastics Limited who own the subject site. On the northwest it is bordered by the N81, to the south by Burgage More, and to the east by the Milltown Gate estate.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14, D14 EA89

² 14/15 Camden Street Street, Dublin 2

³ [REDACTED]

Please refer to Section 3.0 below for further details of the site's location and extent.

1.3 Structure of this Submission

The Report continues with the following structure:

Section 1.0 – Introduction

Section 2.0 – Executive Summary

Section 3.0 – Site Location

Section 4.0 – Core Strategy and Population Growth in Wicklow

Section 5.0 – Audit of Land in the Settlement the Need to Retain Residential Zonings

Section 6.0 – Coherent and Integrated Infill Development

Section 7.0 – A Feasible and Viable Residential Proposal for the Subject Site

Section 8.0 – Conclusion

2.0 EXECUTIVE SUMMARY

Purpose of this Submission

- To provide a robust justification to support the appropriate zoning of land in the settlement. In particular **to rezone lands at Burgage More from E: Employment to R1: New Residential.**

Site Location

- The site is comprised of 1 No. plot with a total area of approximately 1.334 Ha.
- It is bound by existing development on 4 No. sides, making it an infill site within the Built-Up Area. It presents a genuine opportunity to integrate with existing development, and to create new pedestrian and cycle linkages from existing residential areas to the N81 and onwards to the town centre.
- The site is within short walking and cycling distance of a host of important day-to-day services and amenities, making it a sustainable location and one that will promote active modes of transport. These services include:
 - Convenience retail;
 - Childcare;
 - Healthcare;
 - Schools; and
 - Personal services.

Core Strategy and Population Growth: Revisions Required and a Progressive Approach Needed

- The Core Strategy of the *Wicklow County Development Plan 2022–2028* has allocated very limited housing growth figures to Blessington (only 393 No.) between Q3 2022 and Q2 2028. This conflicts with the overarching need to deliver housing in existing settlements of scale, where services and infrastructure are available.
- The targeted housing growth is founded on a population target for Blessington of 6,145 by Q2 2028. However, County Wicklow's population growth has outstripped national change in recent years, with Blessington's population already reaching 5,611 by Q3 2022.
- Changes to national and local population growth and its patterns are currently being considered as vital elements of updates to the *National Planning Framework*. Furthermore, the ESRI has been tasked with revising their methodology for population projections and housing growth allocations in Core Strategies
- It is widely accepted that the government's *Housing for All* plan in 2021 greatly underestimated the actual housing demand in the country. While it identified a need for 33,000 no. units per year, current studies have calculated that demand to be actually in the order of 74,000 units per annum. This is likely to be the case for some years to come, to meet both pent-up, and emerging demand. This calls for a more robust and progressive approach to housing delivery, in order to deliver the nation's actual housing needs.

- Regardless of the ESRI's proposed methodology, we respectfully request the Council to take an authoritative and progressive stance on its housing requirements and distribution across the County. We encourage the Council to allocate adequate housing units and by extension, zoned land, to Blessington in order to meet continued growth.
- We acknowledge that revisions to the Core Strategy may require a variation to the Development Plan, thereby potentially slowing down the adoption of the new LAP. However, we submit that such an approach is required and should be expedited to ensure adequate housing delivery in the short and medium-term.

Audit of Land: Limited Residential Land Remains Available

- A total of 11 No. sites zoned with 'proposed residential' designations were identified in the audit on the Blessington LAP 2013-2019 – 'Land Use Zoning' map.
- Of the 11 No. sites, 2 No. sites (8 and 9) have already been developed, with housing estates completed at time of writing of this report. 3 No. sites (3, 6 and 10) consist of lands with current planning permissions that can be implemented at any time. A further site (site no. 1) is awaiting a decision on a current planning application. Additionally, 5 No. sites (2, 4, 5, 7 and 11) include lands that are very unlikely to be suitable for housing delivery in the foreseeable future due to infrastructure deficits, access issues, or phasing requirements.
- This does not leave any 'proposed residential' sites in Blessington which can realistically be brought forward for a planning application in the near future.
- **Therefore, we contend that given the strong need to improve housing delivery, there is significant merit in rezoning the lands at Burgage More from E: Employment to R1: Proposed Residential. This site is particularly suitable for residential development, due to its sustainable location, accessibility and availability of services.**

Opportunity for Coherent and Integrated Infill Development

- The benefit of re-zoning and developing this site is that it presents a logical and sequential pattern of urban development. It counters the emergence of disconnected, finger-like expansion of the town, and by consequence, the inappropriate leapfrogging of appropriate sites.
- It will fill a void of development that exists within the existing Built-Up Area (BUA) or Built Envelope of the town, as shown in Figure 2.1. As the purple arrows illustrate, development of the subject site will consolidate the existing area developments in an orderly and integrated manner.
- Additionally, the orange arrow shows the coalescence of the built up area that can be achieved and the improvement in pedestrian access to existing footpaths on the N81. Development of the subject site will add to the interconnectedness between existing and future developments.



Figure 2.1: Infill development potential at the subject site with the benefit of coherently, orderly and sustainably infilling and integrating with the existing BUA and future development

Source: Google Earth (image from June 2018-newer), annotated by Thornton O'Connor Town Planning (2024)

A Genuine, Feasible and Viable Residential Proposal for the Subject Site

- Our Client has a genuine interest in delivering housing on the subject lands. On the basis of the strong justification that exists to support the R1 zoning of the subject lands, our Client has appointed ALTU Architects to prepare a high-level masterplan for this site. This is to demonstrate the feasibility of delivering housing at the site and to provide the Council with evidence of their intent to develop the property.
- The proposed layout (Figure 2.2) takes a holistic approach to the design, and considers and incorporates the following:
 - Pedestrian and cycle linkages through the site, which would create a new, safer access from existing residential neighbourhoods to the N81, and onwards to the town centre.
 - A sensitive transition from employment to residential lands, with appropriate screening and a well-considered layout.

- Attractive and functional landscaping and open space.
- Increased permeability for the existing neighbourhood.
- Convenient access to the adjacent bus service.
- Varied densities that respect site attributes and sensitivities.



Figure 2.2: Proposed residential layout for the subject lands

Source: *Sketch Proposal*, ALTU Architects (March 2024)

3.0 SITE LOCATION

3.1 Site Location and Extent

The subject lands are comprised of 1 No. plot, located approx. 1 km. southwest of Blessington Town Centre. The area of the subject site is 1.334Ha. It is bordered on the northeast by Embankment Plastics Limited who own the subject site. On the northwest it is bordered by the N81, a Texaco service station, and a business – Ecolodge Renewables. It is bordered on the south by Burgage More, and to the east by the Milltown Gate estate.



Figure 3.1: Location of the subject site

Source: Google Earth (image from June 2018-newer), annotated by Thornton O'Connor Town Planning (2024)

To provide further detail to the site location and context, a site photograph is provided in Figure 3.2 below. It demonstrates the interconnected nature of the site within its context and its potential to integrate with existing built development on all 4 No. sides.



Figure 3.2: Photograph of the subject lands, Approximate site boundary outlined in red

Source: Embankment Plastics (March 2024), annotated by Thornton O'Connor Town Planning (2024)

The site is within the existing Built-Up Area (BUA) or Built Envelope. Therefore, it is an appropriate location at which to facilitate further residential development. Additionally, as will be expanded upon below, it is an 'infill' site, given that it is abutted by existing development on 4 No. sides.

The subject site presents an excellent opportunity to deliver much needed homes in a sustainable location. The land is an underutilised, infill site, within a burgeoning residential neighbourhood. A residential development on this site would contribute to the visual amenity and character of this area. A development here would also create new pedestrian and cycle linkages from the existing housing areas onto the main road into Blessington town centre. It is immediately adjacent to a bus stop, and therefore would benefit from easy access to public transportation to Blessington town centre, Tallaght and Dublin City Centre. Furthermore, it is within short walking distance of Blessington town centre.

3.2 Surrounding Context and Service Provision

The site is well-served by many of the basic services, facilities and amenities needed to support a new population and an expanding community. These assets are vital to meet the day-to-day requirements of people in all stage of life - individuals, couples, younger and older families, and empty nesters.

As evidence of this, we have mapped some (but not strictly all) of these; including schools, childcare facilities, healthcare providers⁴, convenience retail outlets and personal services⁵ within the environs of the site (Figure 3.3). As shown, a host of these are within 13–25 minutes' walk or 4–7 minutes' cycle of the site entrance at its interface with the N81. Additionally, there is a bus stop for the number 65 Dublin Bus service adjacent to the property, in front of the Texaco service station. This route provides frequent service to Tallaght, Dublin city centre, and Blessington Town Centre. **Given national, regional and local policy efforts to promote more active modes of transport in replacement of the car, the location is within an accessible and sustainable distance of these important assets.**

In addition to the number 65 Dublin Bus service, Blessington is served by several other important bus routes. These routes are operated by Dublin Bus, Bus Éireann and Local Link. They connect the town with nearby locations in Wicklow and Kildare; as well as locations in Dublin and Wexford. Routes include:

- Route No. 132 – Bunclody/Rosslare/Tullow to Dublin City Centre
- Route No. 183 – Arklow to Sallins – with stops in Wicklow Town and Naas
- Route No. 885 – Baltinglass to Sallins via Naas
- Route No. 863 – Blessington to Pearse Station (Dublin City Centre)

These routes serve a series of bus stops present along the length of Main Street, all within walking distance (approx. 1 km) of the subject site.

⁴ Examples: medical, dental and pharmacy.

⁵ Examples: hairdresser/barber, dry cleaners, beauty, etc.



Figure 3.3: Key services, facilities and amenities in Blessington and their accessibility from subject site

Source: Google Earth (image from June 2018-newer) and Google Maps (2024), annotated by Thornton O'Connor Town Planning (2024)

4.0 CORE STRATEGY AND POPULATION GROWTH IN WICKLOW

4.1 Settlement Hierarchy and Core Strategy of the *Wicklow County Development Plan 2022–2028*

The following sub-sections introduce the subject site in the context of County Wicklow's Settlement Hierarchy and Core Strategy. The purpose of this is to emphasise the merit in (and need to) appropriately zone additional land for residential use in the LAP settlement.

4.1.1 Settlement Hierarchy

The Development Plan identifies Blessington as a **Level 3 'Self-Sustaining Growth Town'** within the 'Core Region' of County Wicklow's Settlement Hierarchy. Such settlements have a *"...moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining."*

The Development Plan further remarks the following in relation to these settlements:

*"...towns that contain a **reasonable level of jobs and services which adequately cater for the people of its service catchment**. These may include sub-county market towns and commuter towns with **good transport links**, which have **capacity for continued commensurate growth to become more self-sustaining**. These towns are regionally important local drivers providing a range of functions for their resident population and their surrounding catchments including housing, local employment, services, retail and leisure opportunities."*

*The RSES recognises that towns in the Metropolitan Area and Core Region tend to have experienced strong commuter focused growth but some of these towns offer potential for increased residential densities at high quality public transport hubs and **can accommodate average or above average growth to provide for natural increase**, service and/or employment growth, where appropriate."* **[emphasis added]**

Clearly, the Development Plan recognises the potential, need and scope to deliver much-needed housing (as well as other services and employment) in Blessington.

4.1.2 Core Strategy

The Core Strategy of the Development Plan has calculated population growth, housing targets and zoning requirements. This is based on 2016 Census data using the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020). Details of this are shown in Table 4.1 below.

It indicates that for the period 2016–2031, a housing target of 514 No. units is set for Blessington. Although the Council's assessment includes the 2016–2020 period, the 2017–2022 completions and 2021–Q2 2022 estimated completions during these years were excluded. Noting the Development Plan's life, 2022–2028, further nuance is provided in Table 3.5 of the Core Strategy. It notes *"Housing Growth"* between Q3 2022 and Q2 2028 of only 393 No. units for Blessington. This growth is based on a population target for the town of 6,145 by Q2 2028.

We contend that growth at this level is incredibly limiting (as overall numbers), unrealistic (in terms of the settlement's potential and market demand to live there) and unsustainable (given the settlement's location, existing infrastructure, services and amenities). Added to this, we are acutely conscious of the *Blessington Local Area Plan 2013–2019*'s expiration, but with the Development Plan's apparent continued reliance on its zoning provisions.

Settlement	Population and Housing				Zoning							
	A	B	C	D	E	F	G	H	I	J	K	L
	Census 2016 Population	Census 2016 (%)	Housing Target 2016-2031 (Less 2017-2020 Completions) (Units)	Housing Target (% of 2031 County Target)	Development Capacity of Existing Zoned Lands (Units)	Development Capacity of Existing Zoned and Within Built-up Area (Units)	Development Capacity of Existing Zoned Lands Outside Built-up Area (Units)	Development Capacity of Existing Zoned Lands Within Built-up Area as % of Total Development Capacity	Units Required to be Provided Outside of Built-up Area (Units)	Surplus Capacity of Existing Zoned Lands Outside Built-Up Area (Units)	Surplus Lands Outside of Existing Built-up Area (Ha)	Method of Addressing Shortfall / Surplus
County Wicklow	142,425	100%	11,719	100%	-	-	-	-	-	-	-	-
Blessington	5,234	4%	514	4%	1,450	300	1,150	21%	215	935	31	Surplus addressed in next LAP

Table 4.1: Core Strategy information for the settlement of Blessington

Source: *Wicklow County Development Plan 2022–2028*

4.2 Strong Population Growth in the Settlement and County

The State's population grew by 8.1% to 5.15 million between 2016 and 2022. Whilst this was approximately 'in line' with the *National Planning Framework's* projection of 5.1 million, we note that the growth of County Wicklow was greater than this, at 9.4%. Blessington's growth rate was 7.2% between the same years. This slightly lower level of growth in Blessington may be due to a shortage of residentially zoned sites that are readily deliverable. These figures are elaborated upon in Table 4.2.

Measure	Blessington	Wicklow	State
2016	5,234	142,425	4,761,865
2022	5,611	155,851	5,149,139
Change (No.)	377	13,426	387,274
Change (%)	7.2%	9.4%	8.1%

Table 4.2: Population change between 2016 and 2022

Source: CSO (2023), Collated by Thornton O'Connor Town Planning (2024)

Even with local growth slightly below national levels, the remaining land zoned 'proposed residential' in the Blessington LAP is extremely limited. This constriction of supply is preventing necessary delivery of local housing needs. As outlined in our audit findings in section 5 of this report, all of the sites zoned 'proposed residential' in the Blessington LAP 2013-2019 that do not have significant barriers to timely development, have already been developed or have current planning permission for development. This leaves no lands imminently available to address the continuing housing shortage. This reality is contrary to the County Development Plan's 'Core Strategy' assertion that "*remaining surplus will be addressed in next LAP*", which implies 'dezonings' or the application of phasing restrictions which will act as impediments to appropriate growth. Current population projections demonstrate that additional residential zonings in sustainable locations, such as the subject site, are badly needed. This is elaborated on below.

4.3 Need for Revisions to Core Strategy Methodologies

The Department of Housing, Local Government and Heritage has acknowledged the current population growth patterns. They stated in June 2023:

*"In acknowledgment of the changing profile of Ireland's population structure, the department has engaged the Economic and Social Research Institute (ESRI) to update their previous independent and peer-reviewed research on Structural Housing Demand research which was published in December 2020 and forms the basis for the calculation of housing supply targets at local authority level. The work of the ESRI is dependent on the release of Census 2022 data by the CSO. The data provides the evidence base to inform any revision to the National Planning Framework and subsequently any update to housing supply targets as set out in Housing for All."*⁶ [emphasis added]

This update forms part of a wider review and revision of the *National Planning Framework*, with Minister Housing, Local Government and Heritage, Darragh O'Brien, adding that:

⁶ Press Release: Minister O'Brien outlines revision process for National Planning Framework. Published 20th June 2023.

"The review will be evidence based, with demographic modelling undertaken by the ESRI to inform our housing targets and zoning requirements..."

As we know there are uncommenced planning permissions for approximately 80,000 homes nationwide and enough land zoned for approximately 300,000 homes." [emphasis added]

Evidently, revisions to the methodology required to model population growth and the resulting requirement for zoned land are expected imminently. We note that a draft revised *National Planning Framework* was due for publication and consultation during the period between November 2023 and January 2024, with amendments during February 2024 and final adoption of the plan was expected in March 2024. However, on 5th March 2024 the Government announced⁷ a deferral of the approval of revisions to the National Planning Framework. Their reasoning is explained below:

In light of the extent of recent demographic change and the implications for future population projections and structural housing demand, Government has decided to defer the approval of a draft revised National Planning Framework until the full suite of data required to properly consider matters relating to demographics and population projections has been received from the Economic Social and Research Institute (ESRI).

The final draft report from the ESRI is expected in April 2024, and publication of the draft revised NPF for public consultation is expected in June 2024. An Amendment Stage will follow in August 2024 for review and consideration of the submissions received and the application of any relevant amendments. The finalised document is expected to be published, subject to approval, in September 2024.

We are optimistic that the ESRI's new methodology⁸ will support a more progressive approach to population projections and land-use zoning designations given the significant failure of housing supply to keep up with population growth for many years. This is in light of the Minister acknowledging that there is "enough land zoned for approximately 300,000 homes" and low targets of just 33,000 No. units per years (see by *Housing for All*), but with estimates from multiple parties indicating that the annual housing requirement for the state for the coming years is up to 50,000 No. units⁹ or even up to 62,000 No. units¹⁰ per annum. **Indeed, Dr Ronan Lyons has been recorded as stating that up to 74,000 No. units¹¹ per annum are, in fact, required.** These figures are from informed parties and are all markedly greater than the now dated and inaccurate housing targets in *Housing for All*.

Regardless of the forthcoming revisions to the ESRI's methodology, we respectfully request the Council to take a progressive approach with respect to the population

⁷ Statement from Government, Department of Housing, Local Government and Heritage, 5 March 2024: <https://www.gov.ie/en/press-release/b7288-statement-from-department-of-housing-local-government-and-heritage/#>

⁸ Which we understand will replace the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020).

⁹ Minister Simon Coveney in April 2023: <https://www.independent.ie/news/up-to-50000-homes-a-year-needed-to-meet-demand-minister-admits/42439785.html#:~:text=News-,Up%20to%2050%2C000%20homes%20a%20year%20needed%20to%20meet%20demand,9%2C000%20social%20homes%20in%202022.&text=Ireland%20needs%20up%20to%2050%2C000,than%20it%20did%20last%20year.ear.>

¹⁰ Housing Commission unpublished report sent to Minister O'Brien in November 2022: <https://www.irishtimes.com/ireland/housing-planning/2023/01/26/ireland-needs-almost-double-amount-of-new-builds-in-housing-targets-research-finds/>

¹¹ Dr Ronan Lyons in October 2023: <https://businessplus.ie/news/houses-building/>

projections, settlement allocations and land-use zoning designations of the County. We acknowledge that revisions to the Core Strategy will likely require a variation to the Development Plan, thereby potentially slowing down the adoption of the new LAP. However, we submit that such an approach is required and should be expedited to adequately cater for housing demand in the short and medium-term.

4.4 Justification for Additional Population and Household Allocations

As has been demonstrated above, we assert that the Development Plan Core Strategy's population and housing targets for the 2022–2028 period (and even extending this to include the 2022–2031 period) are not a realistic reflection of the County's (nor the settlement's) recent population growth, its requirements, potential and capacity.

Forthcoming changes to the housing target methodology are optimistically hoped to be more progressive in identifying population change and accommodating housing supply. In this light, we respectfully request that the Council takes an approach which aims to ensure a necessary level of housing delivery.

As an extension of this, we are firmly of the opinion that amending the current zoning of the subject site to R1: New Residential will accord with the principles of proper planning and sustainable development and the need to continue accommodating housing delivery and at a well-located infill site.

5.0 AUDIT OF LAND IN THE SETTLEMENT AND THE NEED TO RETAIN RESIDENTIAL ZONINGS

To understand the quantum of development undertaken in recent years and to determine how little residential land remains available, we have undertaken an audit of lands zoned by the LAP for 'proposed residential' uses. This forms part of the justification to support the appropriate expansion of new, residential zonings at the subject site.

This audit, which ultimately seeks to understand the availability of land remaining for residential development, is undertaken in the context of:

- Evident shortcomings in the Development Plan's Core Strategy, which are discussed above and aided by this exercise; and
- The Development Plan's implied intention that residential **dezoning**s may take place or onerous phasing limitations may be applied as part of the forthcoming LAP's preparation, despite a continued need for additional land¹².

For clarity, the current LAP's 'new residential' zonings fall under two different designations that also prescribe relevant densities (units per hectare – uph) to be applied to specific sites¹³. They are listed as follows:

- R1: New residential – To protect, provide and improve residential amenities
- R2: New residential Low Density – To protect, provide and improve residential amenities at a lower density generally being 20/ha.

5.1 Audit Methodology

The audit methodology involved the following steps:

- Review and identification of 'proposed residential' zoned lands that were indicated as undeveloped on the LAP's zoning map.
- A check of the sites' relevant planning histories using the National Planning Application Database¹⁴ (NPAD) and Wicklow County Council's online planning register¹⁵.
 - Planning Applications for small developments (generally less than 5 No. units) were not included, as they mostly related to one-off housing units.
- Sites with the benefit of Planning Permission or a decision pending on a Planning Application:
 - Were categorised in terms of their position within the existing Built-Up Area (BUA) or 'Built Envelope'.
 - Were further assessed to determine if development had commenced.
- The 'new residential' zoned sites were then identified as assessed in terms of their residential development potential, which considered a range of different factors including (as examples): planning, ecology, infrastructure and individual site attributes.

¹² In relation to zoning in Blessington, 'Table A' of the Development Plan's 'Core Strategy Tables', states that "remaining surpluses will be addressed in next LAP".

¹³ The zoning designation RE: Residential, which can facilitate new development, has not been included in this audit.

¹⁴ <https://www.myplan.ie/national-planning-application-map-viewer/>

¹⁵ <https://www.wicklow.ie/Living/Services/Planning/Planning-Applications/Online-Planning>

5.2 Determining the Status of Sites Zoned 'New Residential'

A total of 11 No. sites zoned with 'new residential' designations were identified in the audit. They are listed in Table 5.1 and mapped on Figure 5.1 below as Sites 1-11.

Of the 11 No. sites, 2 No. sites (8 and 9) have already been developed, with housing estates completed at time of completion of this report. 3 No. sites (3, 6 and 10) consist of lands with current planning permissions that can be implemented at any time. A further site (no. 1) is awaiting a decision on a current planning application. Additionally, 5 No. sites (2, 4, 5, 7 and 11) include lands that are very unlikely to be suitable for housing delivery in the foreseeable future due to infrastructure deficits, access issues, or phasing requirements.

This does not leave any R:1 sites in Blessington which can realistically be brought forward for a planning application in the near future. In light of the severe housing shortage in Wicklow and across the country as a whole, it would be highly irresponsible to adopt a new Local Area Plan which provides extremely limited opportunities for new housing up until 2030. The proposed lands are ready for development, require no significant offsite infrastructure, are infill, and surrounded by an existing residential community.

Site	Reg. Ref. (Primary)	Units (No.)	Final Grant / Planning Status	Comments	Location Relative to the BUA
Subject Site				Infill site on 4 no. sides, proximate to many services, easily walkable to town centre	Within
1	23689	329	Pending	Decision due 15 April 2024, phase 2 of development connected to site no. 3.	Outside
2	No application made	0	N/A	Part of AA1, subject to phasing plan and construction of a through road, as well as development of site no. 1.	Contiguous
3	201146	91	Approved	Phase 1 of development connected to site no. 1.	Outside
4	211396, ABP 312825	56	Refused	Development deemed premature pending construction of Blessington Inner Relief Road	Contiguous
5	No application made	0	N/A	Part of AA4, Operating quarry still on site	Contiguous
6	20184, 20362, ABP 308578	173	Approved	Approval includes Nursing home and 173 residential units	Contiguous
7	No application made	0	N/A	Part of AA2, development subject to construction of significant vehicular access points from L-8858 and phasing restrictions	Contiguous (Infill)
8	041662, 114936	53	Development completed	Milltown Gate Estate	Within

Site	Reg. Ref. (Primary)	Units (No.)	Final Grant / Planning Status	Comments	Location Relative to the BUA
9	19693, ABP 306198	56	Development completed	Burgage Castle Estate	Within
10	211404	106	Approved	Part of AA3, Part 8 Application	Contiguous
11	No application made	0	N/A	Part of SLO1, land accessed through site no. 10, therefore no development possible until site no. 10 developed	Contiguous

Table 5.1: Position of sites and units of sites zoned R1: New Residential in Blessington LAP 2013-2019

Source: Collated by Thornton O'Connor Town Planning (2024) using the National Planning Application Database (NPAD), An Bord Pleanála Case Search, Wicklow County Council's online planning register, and Google Earth

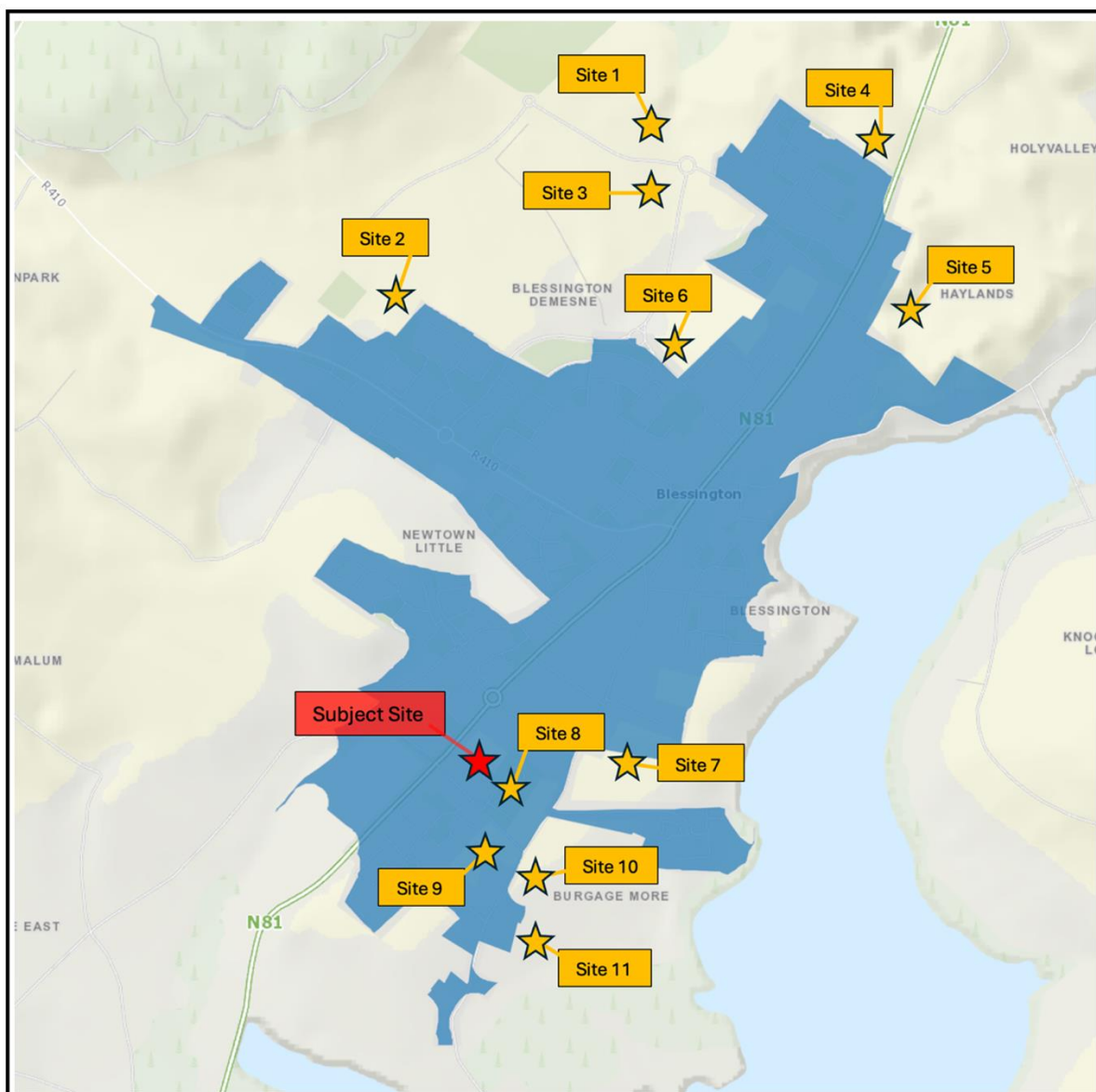


Figure 5.1: Subject site and Audit sites- identified by number- in relation to Built Up Area (BUA) of Blessington, Co. Wicklow

Source: Tailte Éireann, Surveying Open Data Portal, CSO Urban Areas - National Statistical Boundaries – 2022 – Ungeneralised, published 16 June 2023

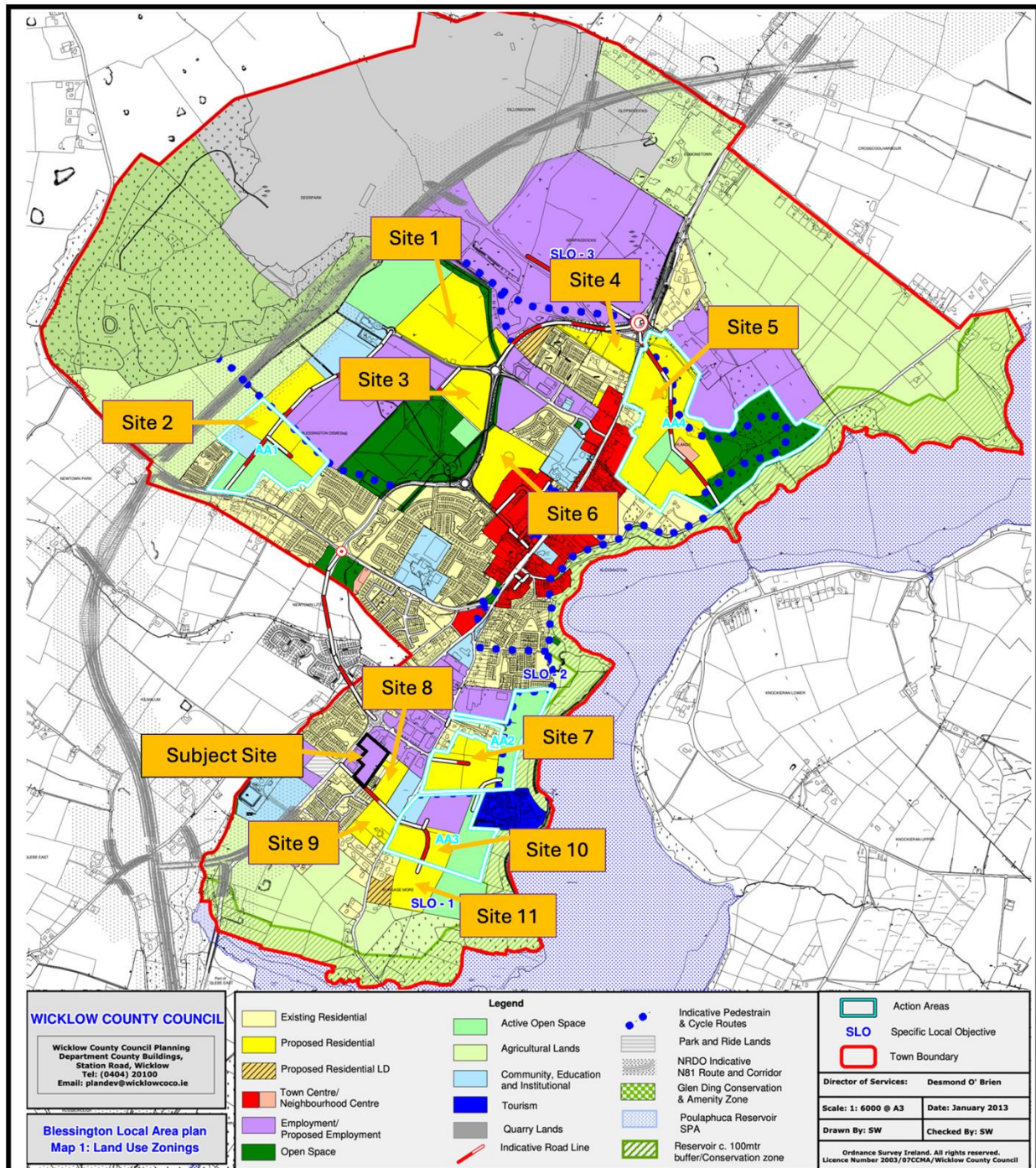


Figure 5.2: Position of R1: New Residential sites identified on Blessington LAP 2013-2019 in relation to the existing Built-Up Area

Source: Collated by Thornton O'Connor Town Planning (2024) using the National Planning Application Database (NPAD), Wicklow County Council's online planning register, *Blessington Local Area Plan 2013–2019*, and Google Earth

According to our audit, 479 No. residential units have been approved for construction on lands identified as 'new residential' in the Blessington LAP 2013-2019. Of these, 109 No. units were identified as within the Blessington BUA. 279 No. were identified on sites that we deemed to be 'contiguous' such that they adjoined/abutted the BUA on at least one side. Additionally, we

identified 91 No. residential units approved on zoned site's that were outside (i.e. separate) to the existing BUA. A further 329 No. units outside the BUA are pending a decision. It should be noted that the subject site is situated within the Blessington BUA. See Figure 5.1.

Site Position Relative to BUA	Sites		Units	
	Number	Percentage	Number	Percentage
Within	2	18.2%	109	22.8%
Contiguous	7	63.6%	279	58.2%
Outside	2	18.2%	91	19%
Total	11	100%	479	100%

Table 5.2: Position of sites and units relative to the existing Built-Up Area

Source: Thornton O'Connor Town Planning (2024)

5.3 Assessing the Residential Development Potential of Remaining Land

Informed by the foregoing, as seen in Table 5.3, we have individually assessed each of these sites to determine their ultimate residential development potential; however, the findings reveal potential to be limited in most cases.

Site	Key Considerations and Development Potential
Subject Site	<p>No impediment to development. Infill site categorisation given it abuts existing BUA on all 4 No. sides. Proximate to a host of local services, facilities and amenities makes it a sustainable and well connected location at which to accommodate additional housing (Section 3.o).</p> <p>Significant potential exists at the site for much-needed housing delivery that will integrate with existing and proposed residential development, as facilitated by the access point from Burgage More to the south of the site.</p> <p><u>Consequently, there is a strong basis upon which to rezone lands at Burgage More from E: Employment to R1: New Residential.</u></p>
1	<p>A Large Scale Residential Development application has been made on this site (ref. 23689) for 329 residential units. A decision is due on 15th April 2024. This is 'phase 2' of an overall larger development connected to site no. 3. We note that this site is located farther from Blessington Town centre and public transport services than the subject site.</p>
2	<p>No applications for development have been made to date on this land. The Local Area Plan identifies this site as <i>Action Area 1 – Lands adjoining the Naas Road</i>. Prior to any development on this land, a through road must be provided to link the R420 to the adjoining lands and the Blessington No.1 school and KARE Centre. This development is also required to following a phasing plan whereby the Active Open Space Area is delivered before any housing. The delivery of housing on these lands is also interdependent on the development on site no.1. This site is also located farther from Blessington Town centre than the subject site.</p>

Site	Key Considerations and Development Potential
3	Planning permission (ref. 201146) for 91 houses has been approved on site no. 3. This is "phase 1" of the development connected to site no.1
4	Permission was refused (ref. 211396, ABP 312825) for 56 houses at this site. The refusal was based on, among other things, that the development would be premature pending the construction of the Blessington Inner Relief Road. At the time of this decision (June 2023), this road project was only at preliminary design stage. For this reason, it is unlikely that housing will be deliverable on this site for some time into the future.
5	No planning applications have been made on this site. The Local Area Plan identifies this site as <i>Action Area 4 – Lands at Doran's Pit</i> . This site is currently operated as Roadstone's Doran's Pit. Given the active quarrying operations on this property, this site can only be viewed as a housing option into the long term. Roadstone is still operating this pit, and if they do eventually cease their operations, there will likely need to be a complex and costly remediation scheme implemented on the site before any housing can be built. Development is to be brought forward in phases, and is contingent on the completion and opening of the N81 to L-4371 link road. It will likely be many years before housing is delivered on this site.
6	Planning permission has been approved for a 2 phase development. Phase 1 (ref. 20184, ABP 308578) is for a nursing homes and 77 residential units, and Phase 2 (ref. 20362) is for 96 residential units.
7	No applications have been made for this site. The Local Area Plan identifies this site as <i>Action Area 2 – Lands at Burgage More (north of the Avon Ri Resort)</i> . Two main vehicular access points off L-8858 are required prior to any development on the property. The site is also subject to phasing requirements which include the delivery of Active Open Space.
8	The site has been developed with 53 residential units, and is the Milltown Gate Estate. Development is complete. Ref. 041662, as amended by 114936. Decision date February 17, 2012.
9	This site has been developed with 56 residential units (Ref. 19693, ABP 306198). Development is complete. Decision date November 27, 2019. We note that this site is located farther from Blessington Town centre than the subject site.
10	The Local Area Plan identifies this site as <i>Action Area 3 – Lands at Burgage More</i> . A Part 8 application was approved by Wicklow County Council (ref. 211404) for 106 residential units. Development has not yet commenced. This site is located farther from Blessington Town centre than subject site.

Site	Key Considerations and Development Potential
11	The Local Area Plan includes a Specific Local Objective (1) for this site. No applications have been made on this land to date. This land is accessed through site 10 (<i>Action Area 3</i>), and so no development is possible on this site until that land is first developed. Additionally, this site is located farther from Blessington Town centre than the subject site.

Table 5.3: Audit findings of R1: New Residential (Proposed Residential) sites identified in *Blessington LAP 2013-2019*

Source: Thornton O'Connor Town Planning (2024)

5.4 Audit Conclusions: Highlighting Key Sites for New Residential Development

As previously demonstrated, our audit shows there is a lack of 'new residential' lands in Blessington that are imminently available for development to deliver much-needed housing stock. While the desire to provide employment space in the town (to prevent unsustainable commuting etc) is laudable, there is currently a glut of commercial properties in the Greater Dublin Area, which is leading to high rates of vacancy of commercial properties. This is resulting from a combination of oversupply in market, along with contemporary trends for remote working. At the same time, a severe shortage of homes prevails, leading to unaffordability, homelessness, and uncertainty for families.

The subject site is owned by a Blessington business that provides local employment, and operates on the property immediately adjacent. They do not have a need to expand their business onto this land, and finding a tenant to make a new commercial development viable on this property is highly unlikely. In the meantime, the land sits vacant, in the heart of a burgeoning residential neighbourhood. It requires no infrastructure, and would provide improved and safer pedestrian and cycle connections from the neighbouring estates to Blessington Town Centre and bus connections.

We note the constraints the Core Strategy placed upon the zoning of lands and delivery of housing, nevertheless adequate additional land must remain available. This is vital to deliver the much needed housing demand in this area. As evidenced above, much of the R1 zoned land in Blessington is unlikely to come forward for development in the short to medium term. Furthermore – as discussed elsewhere in this submission – we are aware that revised methodologies from the ESRI are due to be circulated soon. This will almost certainly result in increased housing targets, thereby adding even further validity to our case to rezone the subject site.

This is further supported by the sequential mapping shown on Figure 5.2 below. The 11 No. 'new residential' sites are all shown with approximate distances from Blessington Town Centre. This map illustrates that sites 1,2, 9,10,11 all largely or entirely lie farther from the Town Centre than the Subject Site.

Accordingly, we contend that the subject site is an appropriate location for re-zoning from E: Employment to R1: New Residential. This is due to its lack of constraints, proximity to local amenities and infill categorisation.

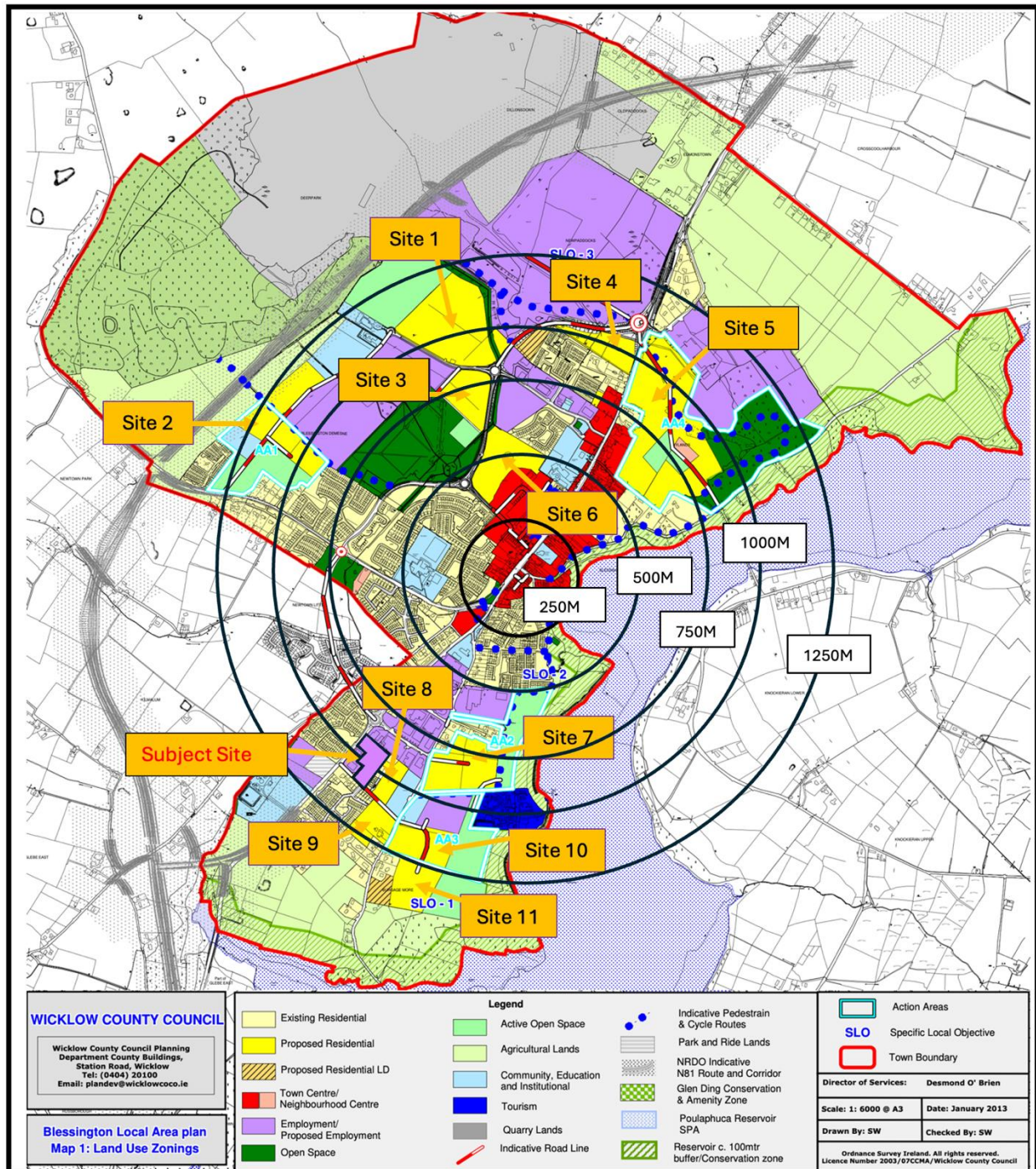


Figure 5.3: Position of R1: New Residential sites identified on Blessington LAP 2013-2019 in relation to the existing Built-Up Area, with approximate distances from Town Centre indicated

Source: Collated by Thornton O'Connor Town Planning (2024) using the National Planning Application Database (NPAD), Wicklow County Council's online planning register, *Blessington Local Area Plan 2013-2019*, and Google Earth

6.0 COHERENT AND INTEGRATED INFILL DEVELOPMENT

The residential zoning of the subject site would facilitate the coherent infilling of development in this part of Blessington. It presents a logical and sequential pattern of urban development that counters the emergence of disconnected, finger-like expansion of the town, and by consequence, the inappropriate leapfrogging of appropriate sites.

In addition, it will fill a void of development that exists between the existing Built-Up Area (BUA) or Built Envelope of the town, as shown in Figure 6.1 below. As the purple arrows illustrate, development of the subject site will consolidate the existing residential neighbourhoods in an orderly and integrated manner. The orange arrow shows the interconnectedness that can be achieved between new and future developments.

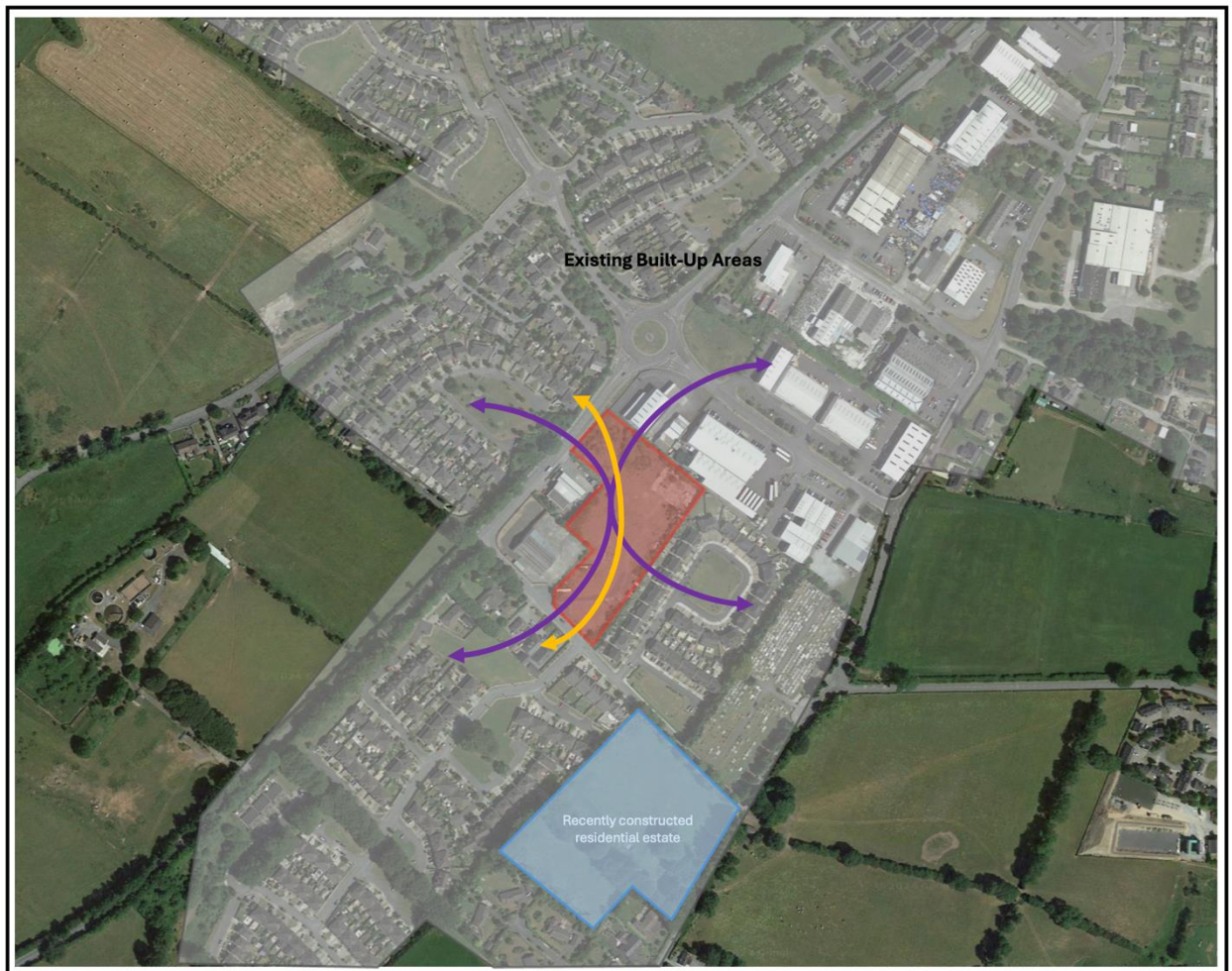


Figure 6.1: Infill development potential at the subject site with the benefit of coherently, orderly and sustainably infilling and integrating with the existing BUA and future development

Source: Google Earth (image from June 2018-newer), annotated by Thornton O'Connor Town Planning (2024)

Failure to re-zone the subject site will diminish the prospect of creating an integrated and permeable residential neighbourhood. Amending the zoning of the subject site will enhance the coherence of the existing neighbourhood and provide much-needed high-quality homes.



Figure 6.2: Site layout of the proposed residential development showing movement strategies, particularly the improved pedestrian route connecting existing developments with the N81 footpaths

Source: *Movement Strategy*, prepared by ALTU Architects (2024)

7.0 A FEASIBLE AND VIABLE RESIDENTIAL PROPOSAL FOR THE SUBJECT SITE

Our Client has a genuine interest in delivering housing at the subject lands. They have commissioned ALTU Architects to design a housing scheme at the subject site that demonstrates a positive vision of how the subject site can improve the liveability of the existing residential area.

The layout and supporting documentation of ALTU's housing design are briefly contained in Appendix A, with the former provided in Figure 7.1 below for ease of review. The layout takes a holistic approach to the design, and considers and incorporates the following:

- Multiple, functional open spaces;
- An attractive layout that would greatly enhance the aesthetics of the area;
- Green infrastructure links, bolstering those that are already present;
- Integration and connectivity with existing development on all sides; and
- Improved pedestrian access between Burgage More and the N81.



Figure 7.1: Proposed residential layout for the subject lands in context

Source: *Proposal in Context*, prepared by ALTU Architects (2024)

8.0 CONCLUSION

This submission to the Issues Paper in respect of the forthcoming *Blessington Local Area Plan* has provided a robust justification to support the appropriate zoning of land in Blessington. In particular, to rezone lands at Burgage More from E: Employment to R1: Proposed Residential.

Existing Core Strategy population and housing targets need to be revisited to reflect the reality of population growth and housing demand in this area. This is not only to respond to market drivers for housing growth in Blessington, but is wholly appropriate given the town's designation as a **Level 3 'Self-Sustaining Growth Town'** within the 'Core Region' of County Wicklow's Settlement Hierarchy. It is also appropriate due to the existing levels of services, businesses and employment opportunities and public transport. Furthermore, we anticipate that the data which will arise soon from ESRI's research will call for a bolder approach to residential zonings.

Therefore, in light of recent population growth and the limited potential for housing delivery from the existing R1 zoned sites, we contend that there is a robust case for zoning the subject site for residential uses. It is within the Build Up Area and can be characterised as infill. It presents a sequentially appropriate form of development compared with many other possible residential sites. It is within easy walking distance of a host day-to-day services, facilities and amenities. Furthermore, public transport services run immediately in front of the site.

There is an oversupply of employment zoned land in the area, and indeed an oversupply of commercial property in the Greater Dublin Area. Meanwhile, there continues to be an acute housing shortage in the area. This site is a logical location to provide a sustainable residential development.

As has been shown above and in the enclosed materials prepared by ALTU, there is clear evidence (1) that the site can be successfully, coherently and holistically developed and (2) that our Client has a genuine intention to deliver housing at the site.

Consequently, we respectfully request that in drafting the land-use zoning maps for the Draft Blessington Local Area Plan, the Council act to zone the subject site for residential development.

We trust that the observations set out in this Submission will prove insightful, and look forward to reviewing the content of the *Blessington Local Area Plan* in due course.

Yours faithfully,



Sadhbh O'Connor
Director
Thornton O'Connor Town Planning

APPENDIX A: ALTU ARCHITECTS, SKETCH DESIGN PROPOSAL, BURGAGE MORE, BLESSINGTON, MARCH 2024



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SITE OVERVIEW



2 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS



SITE PHOTOGRAPHS



3 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS



PLANNING & DEVELOPMENT
Extracts from Meath County Development Plan



Meath County Development Plan 2013-2019
Land Use Zoning Map

Legend



The subject site is zoned by the Blessington Local Area Plan 2013–2019:

E - Employment
with the objective 'to provide for the development of enterprise and employment'

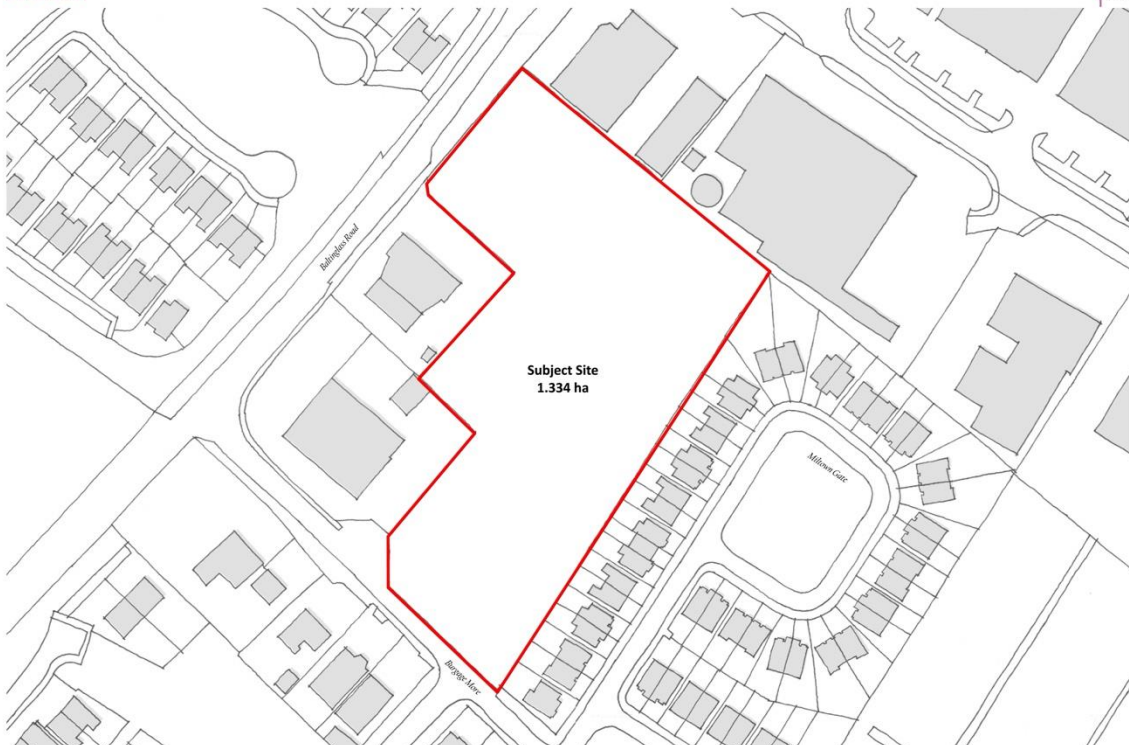
Permitted uses include:
Creche/nursery, industry, motor sales outlet, offices, petrol station, service garage, shops (other), retail warehouse/cash and carry, warehousing/distribution

Site adjoins existing residential developments (south, east and west to the site).

4 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS



SITE PLAN



5 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS

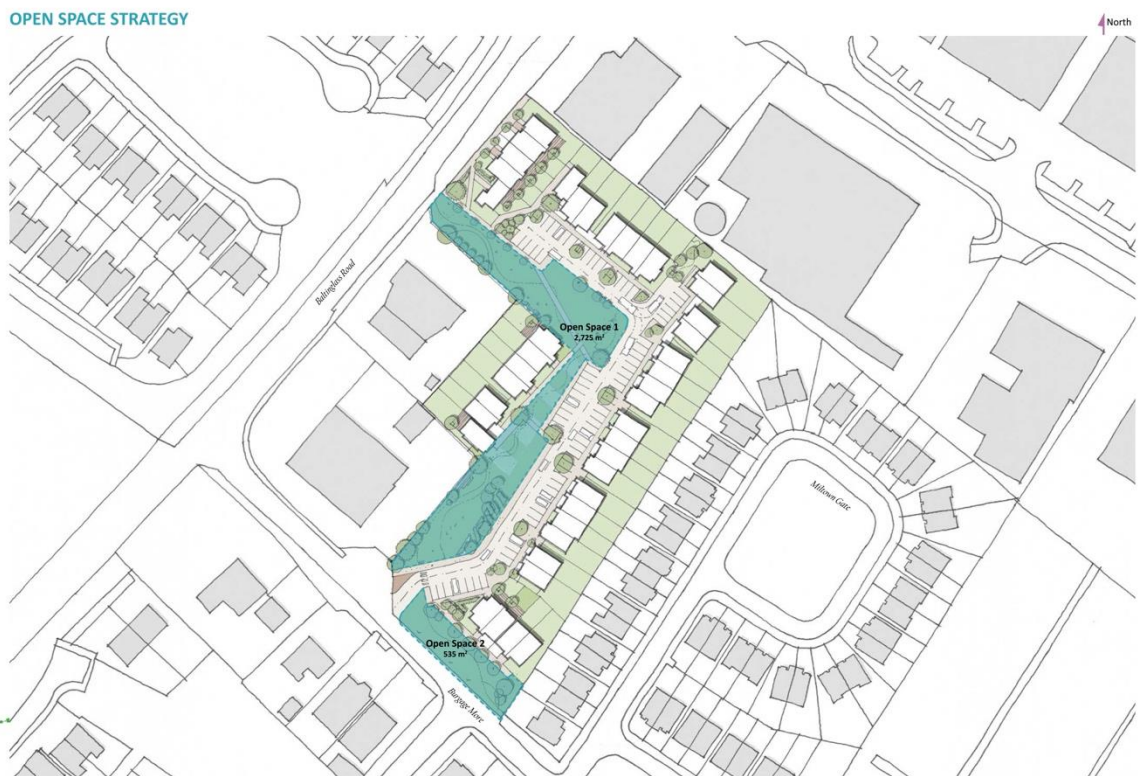


MOVEMENT STRATEGY



6 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS

OPEN SPACE STRATEGY



7 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS

SKETCH PROPOSAL



8

Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS



PROPOSAL IN CONTEXT



9

Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS



MASSING STUDY



10 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS



ACCOMMODATION SCHEDULE



Legend

- T1/T2 - 2 Storey Terrace House - 3 bedrooms/5 pers.
- SD1 - 2 Storey Semi-D House - 3 bedrooms/5 pers.
- D1/D2/D3 - 3 Storey Duplex - 2 bedrooms/4 pers. + 3 bedroom/5 pers.
(or 3 Storey Town House)

Accommodation Schedule

House Type	Description	Size (m ²)	No. Units	% of Mix
T1	Terrace Houses			
	- 3-Bed 2-Storey Mid Terrace	130	25	50
T2	- 3-Bed 2-Storey End Terrace	145	1	2
	Total Terraces = 26			
SD1	Semi-Detached Houses			
	- 3-Bed 2-Storey Semi-D	130	6	12
	Total Semi-Detached = 6			
D1	Duplexes or 3 Storey Town Houses			
	- 2-Bed Ground Floor	90	5	10
D2	- 3-Bed Upper 2-Storey	130	5	10
	- 2-Bed Ground Floor	80	1	2
D3	- 3-Bed Upper 2-Storey	120	1	2
	- 2-Bed Ground Floor	90	3	6
D3	- 3-Bed Upper 2-Storey	145	3	6
	Total Duplexes = 18			
	or Town Houses (TH) = 10			
Total			50/42 (TH)	100

*Site area based on latest survey information (Folio Map)

Site Area	3.30 acre	1.334 ha
Density	37.5 units/ha	
Open Space	2001 m ² = min. 15% required	
	ca. 3260 m ² = 24% provided	

11 Project: HOUSING DEVELOPMENT | BURGAGE MORE BLESSINGTON
Client: EMBANKMENT PLASTICS



THANK YOU

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