



Draft Blessington LAP Amendment Stage Submission - Report

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Topic

LAP - Proposed Material Amendments No 7 Submission

Submission

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LAP - Proposed Material Amendments No 16 Submission

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LAP - Proposed Material Amendments No 19 Submission

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Draft Blessington Local Area Plan 2025-Material Amendments

Submission on Behalf of Cairn Homes Properties Ltd

23 April 2025

CAIRN



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EXECUTIVE SUMMARY

This submission by **Cairn Homes Properties Ltd ("Cairn Homes")** is made in response to Material Alterations of the Draft Blessington Local Area Plan (LAP) 2025, following a detailed submission on the pre-draft LAP consultation in April 2024 and Draft LAP in December 2024.

Cairn fully supports the making of this LAP and encourage the Council to fast track its adoption to support the implementation.

Cairn Homes has an extensive land holding in Blessington. The lands at Blessington Demesne total c.67 ha which under the expired LAP. Cairn has recently completed the construction of 94 houses at Sorrel Wood and recently opened Phase 1 of the Blessington Town Park as the initial phase of the Blessington Demesne development permitted under P.A Reg. Ref: 20/1146. A large creche on lands adjacent to Phase 1, permitted under P.A Reg. Ref: 22/1191, is complete and expected to be operational in 2025.

Cairn's LRD application at Blessington Demesne was remitted to An Bord Pleanála in April 2025. It is hoped that the adoption of the LAP will facilitate The Board to permit the residential element of permission under LRD Ref: 23/689 to progress as well as the Town Park and c. 670m of the Blessington Inner Relief Road, which are already approved.

The adoption of the Material Amendments to the Draft LAP, will likely become material to the Board's decision and will enable the early implementation of these vital projects for Blessington.

This submission therefore highlights important policy details in respect the draft plan to be considered in its adoption by Wicklow County Council:

- In our submission on the Draft LAP in December 2024, Cairn highlighted that more RN1 lands needed to be brought forward and a more flexible approach needed to be adopted in respect of the transition from RN1 to RN2 lands.
- The Draft LAP originally provided for a significant quantum of de-zoning of residential lands contrary to The Programme for Government, the revised National Planning Framework the Development Plan Guidelines and Housing for All. It is acknowledged that the Amended Draft LAP addresses many of those concerns with an increase in Residential RN1 Priority Zoning.
- This rebalancing of Residential zoned land in the Plan is absolutely necessary. It is also important to stress that the LAP remains consistent with the CDP Core Strategy and still faces challenges in redressing the shortfall in lands that we highlighted.
- At the Draft Stage it is estimated that the new LAP reduced the area of new Residential Zoned Land by 38 hectares. The Amended Draft LAP has reduced this shortfall to some 27 ha. This is equivalent to 1,092 homes or population of some 2,948 persons assuming all the zoned land were to be activated. Therefore, while it fully acknowledged that the Draft LAP zoning allocation has moved in the right direction, it is by no means excessive
- WCC secured only 20% activation of zoned land over the last LAP period. The reasons land remains inactive are multi layered and complex and can relate to viability issues, lack of infrastructure, LAP phasing, title constraints, environmental issues etc. The LAP needs to ensure there is adequate provision

for zoned and serviced sites that are likely to come forward during the lifetime of the plan. Consequently, it is always necessary to incorporate an element of headroom in the zoning of land to ensure there is an adequate supply of homes over the plan period. The quantum of zoned land in isolation cannot be the sole metric against which alignment with the core strategy is gauged, but rather ensuring maximum flexibility is enshrined in an LAP to ensure the core strategy targets are secured.

- Cairn Homes endorses the Amended Local Area Plan's overall increase in the amount of RN1 zoned lands, with a specific emphasis on the Blessington Demesne SL02 area.
- Cairn supports the Council's general objective to link infrastructure delivery and phasing of development for the SLO2 area. However, there is a need for a more nuanced approach to this policy and potential planning conditions that restrict occupancy for the whole development areas.
- The approach to phasing should be proportional. The burden of delivering public open space or roads within a housing estate are entirely different to providing infrastructure for town as a whole. A phasing approach that allows release of complete housing in stages to the market is proposed. It is submitted that the optimal approach for phasing infrastructure delivery is by agreement with WCC on foot of planning permissions.
- The Amended Draft LAP now provides the provision of a substantial Community Sports facility on AOS lands. In principle, Cairn supports recreational amenities for residential communities. There are complexities in the layout, design and operation of this facility which need to be resolved at the planning application stage. There is potential for funding commitments in LAP to be shared rather than wholly dependent on development (i.e. Sports Capital Grant, etc.). The wording of the delivery objective for these facilities warrants further review which we expand upon below
- The wording of the objective to deliver the Link Road in Phase B would require Cairn's to deliver infrastructure on lands outside its control and furthermore is not required to enable the delivery of housing on the phase B lands. Cairn advocates a more viable and phased approach for road delivery of this link within the SL02 area only.

1. INTRODUCTION

1.1 Background

MacCabe Durney Barnes has prepared this submission on behalf of **Cairn Homes Properties Ltd (“Cairn Homes”)** of 45 Mespil Road, Dublin 4, D04 W2F1 in response to the Draft Blessington Local Area Plan (LAP) 2025 Material Amendments. This representation is made following detailed submissions on the pre-draft LAP consultation in April 2024 and the Draft LAP in December 2024.

Cairn Homes welcomes the continued evolution of the Local Area Plan in consultation with stakeholders and the community. It is considered that the latest iteration of the plan constructively addresses many issues previously raised and now represents a more robust LAP that is capable of delivering for a growing community with supporting recreational and amenities.

The focus of this submission is on Material Amendment No. 19 which provides a development framework for the development of Cairn’s lands at Blessington Demesne. The LAP provides for the amalgamation of SL02 and SL08 with revisions to lands use objectives and zoning.

Cairn’s submission on the Draft LAP advocated a more flexible approach to the delivery of Residential Development between RN1 and RN2 priorities and draw attention to historic under-provision of housing relative to strategic objectives in the County Development Plan.

The Material Amendments to the Draft LAP address the need to enable more residential capacity at an earlier phase in the LAP’s life span.

This Material Amendment phase takes place amidst important developments at Government and National Planning Policy level.

The Final Draft Revised National Planning Framework has now been published for the approval of each House of the Oireachtas. The strategy notes that ESRI projects that the population of Ireland will increase by around one million people over 2022 levels, to approximately 6.1 million people by 2040, giving rise to a need for approximately 50,000 additional households per annum to 2040.

The new Minister for Housing, James Browne has said *“I will then give a direction to all the local authorities to open up their county development plans and to rezone a very significant additional amount of land so that land is available for builders to build the homes that people need across the country¹,”*

This LAP submission is being prepared subsequent to the recent Split Decision of An Bord Pleanála at Cairn Homes lands under Ref. ABP-319657-24, Wicklow Co. Co. Ref. 23/689 of 12 September 2024. The Board’s decision permitted the development of a 10.65 ha Town Park and c.700m Blessington Inner Relief Road (BIRR) but Refused permission for a residential scheme (329 units). The High Court has now Remitted this decision back to An Bord Pleanála on 11th April. The Board’s decision is likely to have regard to the LAP in its adapted form, which as it stands supports the full confirmation of that decision.

¹ Quoted in Irish Times, 8th April 2025

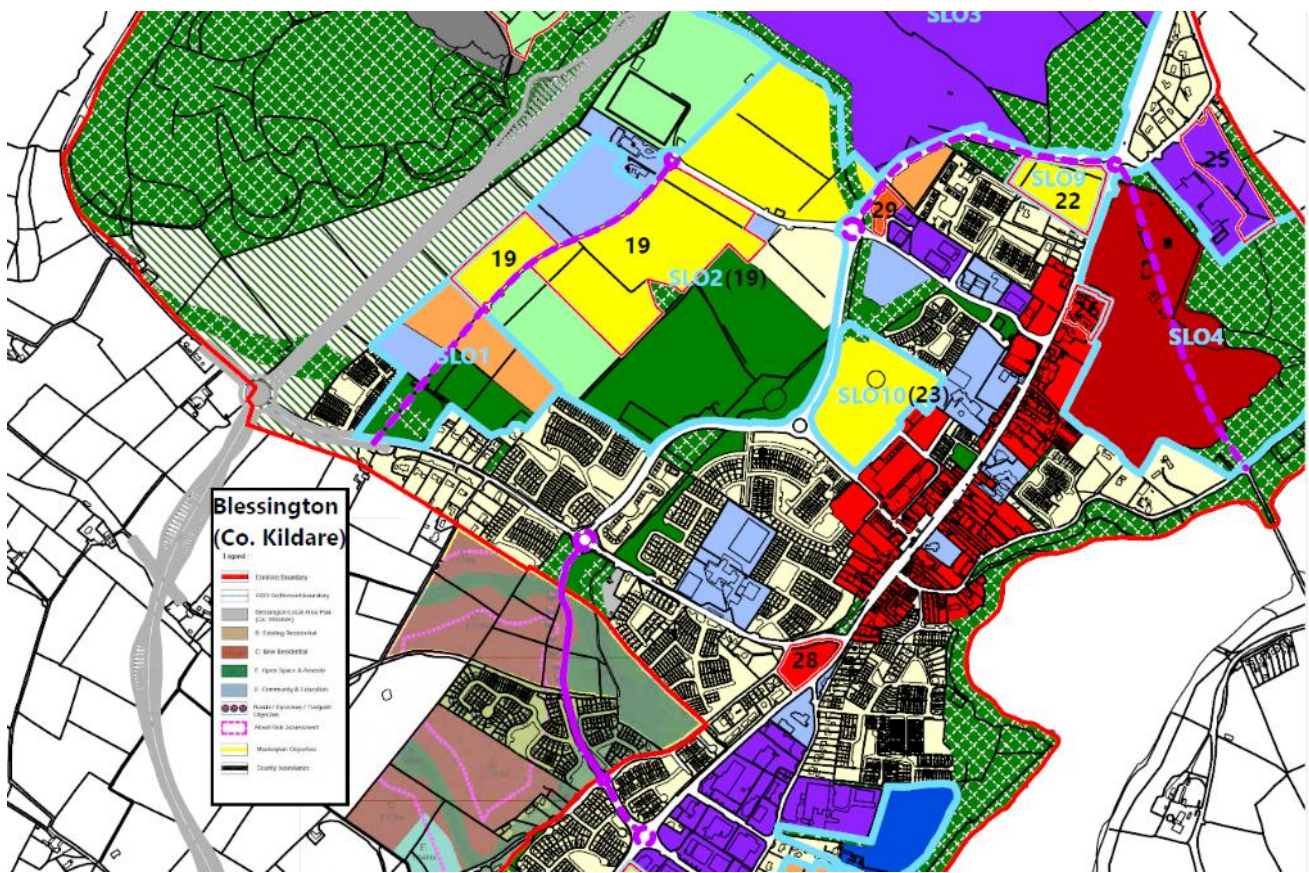


Figure 1: Overview of Cairn lands in Blessington overlaid on draft LAP Amendments zoning map

1.2 Report Structure

Following this introduction, Section 2 addresses Material Amendment No. 7 'Housing Targets'. It highlights that the strategic need for the housing delivery in the LAP and supports the increased quantum of residential zoned land in RN1.

Section 3 address Material Amendment No. 19 for the development of Cairn's lands at Blessington Demesne. The LAP provides for the amalgamation of SL02 and SL08 with revisions to lands use objectives and zoning. This submission provides detailed commentary on the newly introduced text.

Section 4 reviews changes to text in Policy Objectives set out in pages 41 to 56 of the plan.

Section 5 considers Material Amendment 16, Other Infrastructure Objectives.

Section 6 summaries the Conclusions of Cairn's submission.

2. MATERIAL AMENDMENT NO. 7 HOUSING TARGETS & EXTANT PLANNING PERMISSIONS AND MATERIAL AMENDMENT NO. 8 OBJECTIVE BLESS7

Section B2 of the Draft Local Area Plan sets out policies for Housing Development, including Zoning. The Amended Draft LAP proposes an amendment to the section "Housing Targets & Extent Planning Permissions as follows:

Having regard to the Core Strategy and population / housing targets provided therein for Blessington, there is capacity within the lands zoned TC, RE (all located in the serviced, built up envelope) and lands zoned RN1 (greenfield residential lands either within the built envelope or with extant planning permission) to meet current targets.

In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this plan, this plan also provides for additional zoned serviced / serviceable residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will not be considered during the lifetime of this plan for RN2 lands unless the following two conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated) or after 3 years following adoption of the LAP, less than 50% of the RN1 lands have been activated;;*
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.*

Cairn Homes Submission

In our submission on the Draft LAP in December 2024, Cairn highlighted that more RN1 lands needed to be brought forward and a more flexible approach needed to be adopted in respect of the transition from RN1 to RN2 lands.

It is Cairn Homes submission that this rebalancing of Residential zoned land in the Plan was absolutely necessary. It is also important to stress that the LAP remains consistent with the CDP Core Strategy and still faces challenges in redressing the shortfall in lands that we highlighted.

Table 1 below provides analysis of the quantum of zoned residential lands available in the LAP area from the last iteration of the plan, through the Draft Stage and now in the Amended Draft Stage.

At the Draft Stage it is estimated that the new LAP reduced the area of new Residential Zoned Land by 38 hectares. The Amended Draft LAP has reduced this shortfall to some 27 ha.

Table 1 Analysis of change in residential zoned areas between expired and draft LAP

	Draft LAP			Material Amendments		
	In Ha	Change		In Ha	Change	
		(In Ha)	(In %)		(In Ha)	(In %)
Total New Residential Zoned Lands within Expired LAP	61.62			61.62		
New Residential zoned land delivered since previous LAP made	6.83			6.83		
Remaining New Residential Zoned Lands	54.79			54.79		
Change of zoning away from New Residential zoning						
<i>Change to Open Space (OS2)</i>	2.98			2.98		
	51.81			51.81		
Change of zoning to New Residential zoning						
<i>Change from Employment</i>				10.4		
<i>Change from Town Centre</i>	1.01			1.01		
	52.82			63.22		
Unknown Residential Land (Unaccounted)	3.52			3.6		
Balanced New Residential Zoned Lands within new LAP	49.3	-5.49	10%	59.62	4.83	9%
<i>Priority 1 Residential Lands (RN1)</i>	18.1			33.21		
<i>Priority 2 Residential Lands (RN2) & MU</i>	31.2			26.38		
Available New Residential Zoned Lands	18.1	-36.69	67%	33.21	-21.6	39%
Calculated Loss of New Residential land	37.7			27.3		
	40uph			40uph		
Est. Loss of total new units	1,508			1,092		
Est. Loss of household population (Avg: 2.7)	4,072			2,948		

This is equivalent to 1,092 homes or population of some 2,948 persons. Furthermore, a significant part of this landbank at Doran's Pit (12 hectares) is on former quarry lands that may be unlikely to come forward in the initial period of the LAP.

Therefore, while it's fully acknowledged that the Draft LAP zoning allocation has moved in the right direction, it is by no means excessive. Consequently, it is always necessary to incorporate an element of headroom in the zoning of land to ensure there is an adequate supply of homes over the plan period. The quantum of zoned land in isolation cannot be the sole metric against which alignment with the core strategy is gauged, but rather ensuring maximum flexibility is enshrined in an LAP to ensure the core strategy targets are secured.

2.1.1 Zoning Land Activation

One of the key factors in consideration of the appropriate quantum of zoned land in an LAP is percentage that is actually brought forward through the development management process through to release for sale.

The recent report by Goodbody research² demonstrates that actual activation and housing completion rates are far below the 75% rate of all zoned land which the County Development Plan presumes will be delivered in a 6-year period. WCC secured only 20% activation of zoned land over the last LAP period. The reasons lands remain inactive are multi layered and complex and can relate to viability issues, lack of infrastructure, LAP phasing, title constraints, environmental issues etc. However, the point remains that the draft LAP needs to ensure there is adequate provision for zoned and serviced sites that are likely to come forward during the lifetime of the plan.

Table 2 Rate of Activation of zoned land by Region/County

Components of Historical Zoned Completion Rate by Local Authority						
NUTS 2	NUTS 3	Local Authority	Plan Period	Housing Yield of Zoned Land	Completions	Annual Completions
Northern & Western	Border	Donegal	2018-2024	7,681	3,261	544
	West	Galway City	2017-2023	9,093	1,459	243
Southern	South-West	Cork City	2015-2021	11,910**	3,392	565
		Cork County	2014-2020	44,077**	6,220	1,037
Eastern & Midland	Dublin	DLR	2016-2022	33,600	7,082	1,180
		Dublin City	2016-2022	52,450	12,891	2,149
		Fingal	2017-2023	49,541	11,638	1,940
		South Dublin	2016-2022	40,143	7,342	1,224
	Mid-East	Louth	2015-2021	57,418*	3,005	501
		Meath	2013-2019	49,098*	5,556	926
	Midlands	Wicklow	2016-2022	27,882*	5,664	944
		Laois	2017-2023	4,848	2,119	353
Longford		2015-2021	2,370*	499	83	
		Westmeath	2014-2020	8,254	824	137
Total				398,365	70,952	11,825

20% Actual Activation

Components of Implied Zoned Completion Rate by Local Authority						
NUTS 2	NUTS 3	Local Authority	Plan Period	Housing Yield of Zoned Land	Housing Supply Target (HST)	Annual HST
Northern & Western	Border	Donegal	2024-2030	12,126*	7,678	1,280
	West	Galway City	2023-2029	6,942	4,433	739
Southern	South-West	Cork City	2022-2028	20,461	16,236	2,706
		Cork County	2022-2028	42,798^	22,611	3,769
Eastern & Midland	Dublin	DLR	2022-2028	22,181	18,515	3,086
		Dublin City	2022-2028	49,175	40,150	6,692
		Fingal	2023-2029	35,001	16,245	2,708
		South Dublin	2022-2028	21,490	15,576	2,596
	Mid-East	Louth	2021-2027	20,525*	6,524	1,087
		Meath	2021-2027	20,581*	16,989	2,832
	Midlands	Wicklow	2022-2028	23,623	8,467	1,411
		Laois	2021-2027	3,948	3,998	666
Longford		2021-2027	2,734*	2,568	428	
		Westmeath	2021-2027	5,319	4,983	831
Total				286,904	184,973	30,829

36% Implied Activation

² Goodbody (September 2024) Residential land availability, an assessment of residential land provision in Ireland

Amendment to Section B2 and Residential Objective BLESS7

Material Amendment No. 7 of the Amended Draft Local Area Plan proposes an amendment to the section "Housing Targets & Extent Planning Permissions as follows:

In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this plan, this plan also provides for additional zoned serviced / serviceable residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will not be considered during the lifetime of this plan for RN2 lands unless the following two conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated) or after 3 years following adoption of the LAP, less than 50% of the RN1 lands have been activated;;

This change is also reflected in changes to the wording of Residential Objective BLESS7.

Cairn's submission on the Draft LAP suggested the wording provide for 50% of the Priority 1 lands and a flexible policy response to deal with non-implementation in short term. ie. incorporate a clause to allow applicants to demonstrate a case where RN1 sites cannot not be implemented in the short term as Priority 1 and should be assessed as Priority 2 lands.

While the Amended Draft LAP provides a more realistic allocation of RN1 zoned lands, we wish to highlight that the wording "will not be considered" under Objective BLESS7 remains problematic. The qualifying condition that (RN1) lands have been activated is still restrictive and as historic activation rates have illustrated. Procuring activation of 75% of Priority one lands is implausible particularly as it is associated with unreliable Core Strategy Targets.

Cairn Homes submit that 'flexibility' entails allowing a soft transition or interchangeability between Priority 1 and 2 does not conflict with the core strategy. The LAP's phasing strategy should be more resilient, to account for unforeseen impediments that could rule out significant areas from development.

The LAP policy to refuse to even 'consider' development proposals on Priority 2 lands until the majority of Priority 1 lands are activated (or after 3 years) is highly restrictive and will fail to secure the quantum of homes required due to unsuccessful land activation (the concerning legacy statistics from Goodbody Research set out above). It is submitted that whilst the Draft LAP seeks to prioritise development of town centre lands, the BLESS7 policy still places significant impediments to development elsewhere with unnecessary restrictions outside of Priority 1 lands.

The draft LAP statement that permission ***will not be considered during the lifetime of this plan for RN2 lands unless...*** is overly negative and should be omitted. It is vital that a pipeline of development permissions is encouraged to progress through the planning system. While it may be appropriate to link such implementation of permissions with infrastructure delivery it is not appropriate to add further delays to a system that is already too slow. Given that it can take anywhere from one to two years and upward to progress an application through Wicklow Co. Co. and An Bord Pleanála it is inconceivable that developers should not be encouraged to bring proposals forward.

Overall, it is considered that the Priority approach to residential zoning is not necessary. However, where the planning authority consider it is needed to satisfy Government Guidance, it should be amended to enable a softer transition between phases.

It is acknowledged that WCC has provided a wording that seeks to address in principle the policy roadblocks that we identified. The amendments to the LAP support the initial objective to ensure the LAP is a more resilient and flexible policy document, but WCC is invited to consider that there is scope for further flexibility.

3. MATERIAL AMENDMENT NO. 19 SLO2 – BLESSINGTON DEMESNE (WEST) & SLO8 – BLESSINGTON DEMESNE (EAST)

The majority of the lands in Blessington Demesne are in the ownership of Cairn Homes. Material Amendment No. 19 provides for a number of important changes to planning policy and zoning objectives for lands in this area.

Key Issues:

- Cairn Homes supports the Amended Local Area Plan's increase in quantum of RN1 zoned lands overall and particularly in Blessington Demesne SLO2 area.
- Cairn supports the Council's general objective to link infrastructure delivery and phasing of development for the SLO2 area. However, there is a need for a more nuanced approach to this policy and potential planning conditions that links (by agreement) progress in delivery of infrastructure stages with release of residential stages (percentages of development) to the market.
- The approach to phasing should be proportional. The burden of delivering public open space or roads within a housing estate are entirely different to providing infrastructure for town as a whole. A phasing approach that allows release of complete housing in stages to the market is proposed.
- The Amended Draft LAP now provides the provision of a substantial Community Sports facility on AOS lands. In principle, Cairn supports recreational amenities for residential communities. There are complexities in the layout, design and operation of this facility which need to be resolved at the planning application stage. There is potential for funding commitments in LAP to be shared rather than wholly dependent on development (i.e. Capital Sports Grant etc.).
- The wording of the objective to deliver the Link Road in Phase B should be apply to the SLO2 lands only as the road reservation in the SLO1 area is outside its control. Cairn advocates a more viable and phased approach for road delivery of this link.

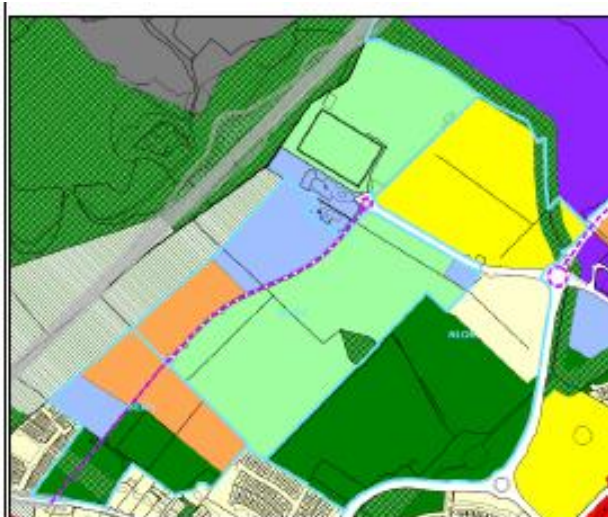
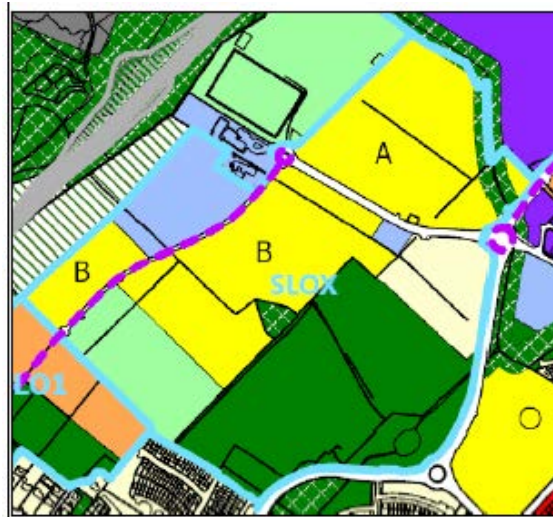
3.1 Amendments to SLO2 and SLO8 zoning

The Amended Draft LAP provides for the following strategic changes:

Amend SLO2 and SLO8 as follows:

- 1. Merge SLO2 and SLO8*
- 2. Amend the land use of zoning of c. 10.4ha in SLO2 from AOS 'Active Open Space' to RN1 'New Residential Priority 1'*
- 3. Amend c. 2.3ha in SLO2 from RN2 'New Residential – Priority 2' to RN1 'New Residential - Priority 1'*

The amended zoning map is illustrated below:

Change From:**Change to:****Cairn Homes Submission**

Cairn supports the amended land use of zoning of c. 10.4ha in SLO2 from AOS 'Active Open Space' to RN1 'New Residential Priority 1' and amendment of c. 2.3ha in SLO2 from RN2 'New Residential – Priority 2' to RN1 'New Residential Priority 1'.

Cairn Homes submission on the Draft LAP (December 2024) sought for the rezoning of the entirety of the AOS area in SLO8 to RN1 Amenity. The Amended Draft LAP still provides for a significant area of 4.5 ha of AOS on Cairn Homes' lands, which represents a considerable planning gain for the Blessington Community.

3.2 Comments on Amended SLO2 and SLO8 Specific Local Objectives' areas and text

Detailed comments on the LAP's text amendments (shown in red) to the SLO2/SL08 are set out in turn. Proposed amendments are shown in Green text.

3.2.1 Phasing of Residential development and occupancy restrictions

Any development proposals for this SLO shall comply with the County Development Plan, this Local Area Plan and the following requirements:

- No dwelling units that may be permitted on foot of the RN1 (Parcel A) zoning may be occupied until the new town park, which shall include a dog park, located on lands zoned OS1, is completed in full. The development of the town park should have regard to and integrate demesne features and other heritage elements associated with the former Blessington Demesne, and should include appropriate buffer zones/mitigating measures in relation to habitats of biodiversity value (including areas identified as Local Biodiversity Areas).

Cairn Homes Submission

There are two elements to this policy objective; (1) the vision for the town park to integrate demesne features and other heritage elements; and (2) the full restriction on occupation of units in Parcel A pending completion of the park.

Cairn supports the Council's general objective to link infrastructure delivery and phasing of development for the SLO2 area. However, **A phasing approach that allows release of completed housing in stages to the market is proposed.**

Section 19(2) of the 2000 Act provides for the phasing of development within a local area plan. The Development Plan Guidelines (2022, p.7) note *"the basis for zoning and plan objectives related to the provision of such infrastructure and the formulation of phasing policies to ensure that identified and required new infrastructure is delivered in tandem with new residential development in particular."*

The Guidelines further note *"There should be a distinction made between public open space required to serve an individual development proposal and that required to serve the community as a whole, which should be zoned accordingly"*.

The approach to phasing should be proportional. The burden of delivering public open space or roads within a housing estate are entirely different to providing strategic infrastructure for the town as a whole.

Cairn Homes has a strong track record of delivering amenities and infrastructure at Blessington Demesne in support of the development of new residential communities for the town. Cairn is already delivering upon the vision for the town park which aims to integrate demesne features and other heritage elements within it's design.

Cairn has recently completed the construction of 94 houses at Sorrel Wood and has opened Phase 1 of the Blessington Town Park as the initial phase of the Blessington Demesne development permitted under P.A Reg. Ref: 20/1146. A large creche on lands adjacent to Phase 1, permitted under P.A Reg. Ref: 22/1191 is complete and expected to be operational in 2025.

Under Ref. ABP-319657-24, Wicklow Co. Co. Ref. 23/689 of 12 September 2024, the Board permitted the development of a 10.65 ha Town Park and c.700m Blessington Inner Relief Road (BIRR). This decision has now been remitted to the Board which it is hoped will allow the Board to confirm Wicklow County Council's decision to Grant Permission for the whole scheme. There is a significant commitment to public road and amenity infrastructure in this application.

Wicklow County Council acknowledges in the CDP that larger residential developments should be sub-divided or broken down into distinct parcels in the interest of character and identity. **CPO 6.30 of the DCD** notes *"The maximum size of any single 'housing estate' shall be 200 units and developments that include more than 200 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes."*

The current LRD application before An Bord Pleanála on the SLO2 Phase 1 lands, seeks to provide 3 distinct character areas. Each one of these character areas is in turn composed of identifiable blocks that have distinct urban design affiliations (i.e. some areas are orientated around Public Open Spaces and others provide an urban edge to the external road network).

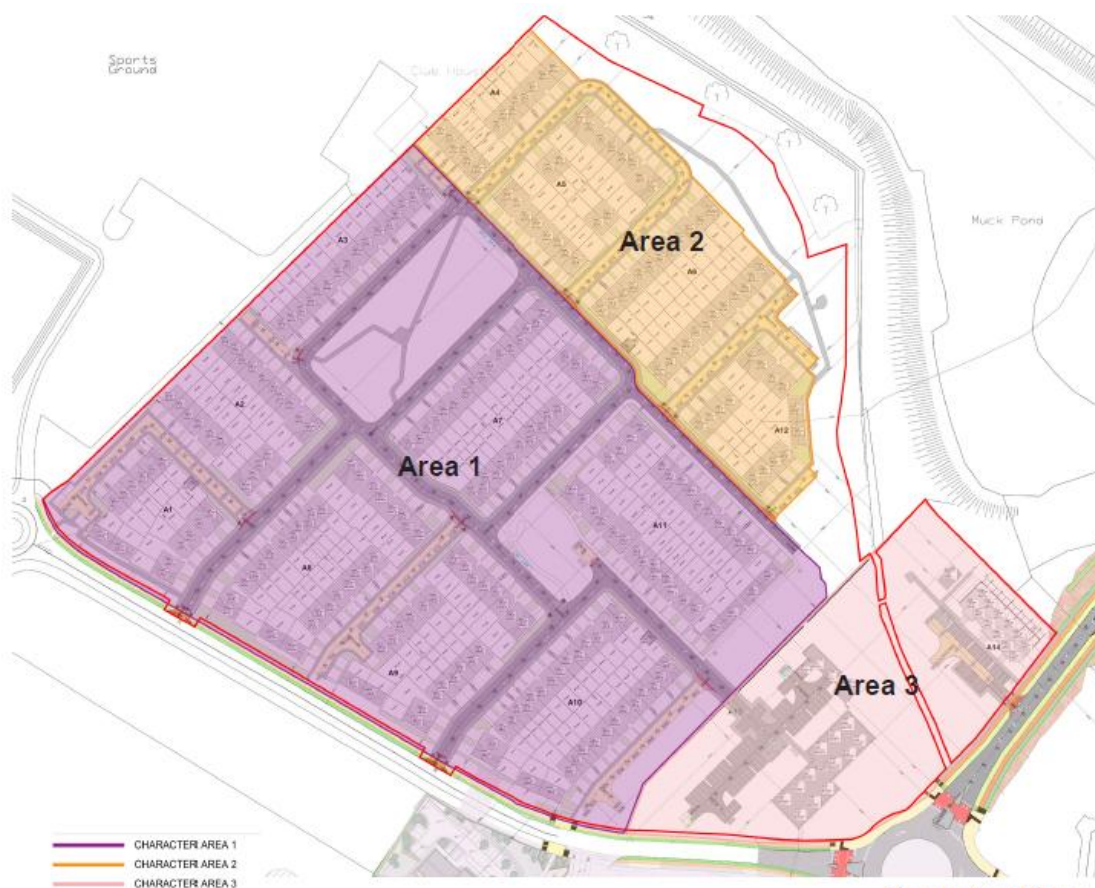


Figure 2 Proposed Character Areas for SLO2 Phase 1 lands (Wicklow Co. Co. Ref. 23/689)

It is proposed to amend the wording of this text as follows:

- ~~No dwelling units that may be permitted on foot of the RN1 (Parcel A) zoning may be occupied on an agreed phased basis until to ensure the timely delivery of the new town park, which shall include a dog park, located on lands zoned OS1, has commenced. The balance of units may be occupied upon practical completion of the town park, unless otherwise agreed with Wicklow County Council.~~ The development of the town park should have regard to and integrate demesne features and other heritage elements associated with the former Blessington Demesne, and should include appropriate buffer zones/mitigating measures in relation to habitats of biodiversity value (including areas identified as Local Biodiversity Areas). A detailed phasing programme shall be submitted for the agreement of the planning authority.

3.2.2 Community Sports facility

The Amended Draft LAP now requires the provision of substantial Community Sports facility on 4.5 ha AOS lands. In the previous Local Area Plan, there was only 0.7 ha located in the town park (phase 1).

- Any new residential development proposals for the RN1 (Parcel B) lands shall be accompanied by proposals for the concurrent development of community sports facility on lands zoned AOS measuring not less than 4.5ha, of a design and layout and including such facilities and support buildings to be agreed with the Planning Authority but which shall include at a minimum a full size polyurethane 400m 8-lane running

track, with field athletics space within, a separate full size (i.e. 90mx145m) multi sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch

Cairn Homes Submission

In principle Cairn supports recreational amenities for residential communities. In our submission on the Draft LAP in December, Cairn Homes highlighted that the allocation of Active Open Space had been grossly miscalculated based on flawed analysis for the town. The Social Infrastructure Assessment Report wrongly assesses need based on Level 2 of the Community Facilities Hierarchy Model – ‘Settlements with population range of 7000-15,000 rather than, Level 3 which is 2,000-7,000. Using a more accurate max. population of 7,000 the AOS demand is 11.2Ha. (not 24 Ha) with unmet demand of 2.48 Ha. not 15.28 Ha. Therefore, the revised area of 4.5ha remains a high allocation of AOS for the town.

However, there are significant complexities in the layout, design and operation of this facility which can only be resolved at the planning application stage. The optimal layout of the track, facilities and pitches requires detailed analysis and design. For example, there needs to be detailed consideration of landscape buffer planting to the residential area, and analysis of how to accommodate floodlights and address ecological sensitivities. There is also the need for consultation with potential user-groups and stakeholders. The funding, construction and operation of this initiative is a significant undertaking in itself. The rigid and prescriptive objective text has potential to undermine this challenging undertaking

Therefore, while the principle of the concept is supported, it is submitted it should be less prescriptive of requirements pending a landscape and project strategy and to be agreed with the planning authority.

It is proposed to amend the wording of this text as follows:

Any new residential development proposals for the RN1 (Parcel B) lands shall be accompanied by landscape masterplan proposals for the concurrent development of community sports facility on lands zoned AOS measuring not less than 4.5ha, of a design and layout and including such facilities and support buildings to be agreed with the Planning Authority ~~but which shall , and which may include at a minimum~~ a full size polyurethane 400m 8-lane running track, with field athletics space within, a separate ~~full size (i.e. 90mx145m) multi sport~~ all weather pitch and/or mixed use all weather sports courts (suitable in size and finish for a range of uses) and/or an all-weather 7-a-side pitch. The phasing and mechanism for delivery of these facilities will be agreed with WCC.

3.2.3 Car Parking for AOS lands

- Car parking to serve the AOS lands should also be of a sufficient size, layout, and location to serve as an alternative car park for access to Glen Ding via the (under construction) green link that passes through the SLO from the town park. The scale of this car parking should not exceed that necessary to serve the AOS lands and alternative access to Glen Ding (noting the limited existing provision of parking spaces at the entrance to Glen Ding), and should not detract from the efficient use of the AOS lands for the primary purpose of active open space/sports/recreation uses.

Cairn Homes Submission

The need for parking facilities to serve the SLO and AOS lands is recognised by Cairn Homes. Again, it is submitted that this is best addressed in conjunction with a detailed landscape masterplan design exercise for the AOS area, to be agreed with the planning authority. It is considered that this can be accommodated in the revised wording for the AOS area set out above.

3.2.4 Community Sports facility and phasing

- No dwelling units that may be permitted on foot of the RN1 (Parcel B) zoning may be occupied until this community sports facility is fully developed suitable for community sports use (including necessary buildings/structures, layout, drainage, surfacing, lighting, access and car parking) and is available for community use;
- This community sports facility shall be suitable for the needs of, and shared use by, potential future educational uses on the site reserved for such within this SLO.

Cairn Homes Submission

The phasing approach for the SLO2 parcel should be proportional. The Community Sports facility has been designed to provide recreational amenity for the entire Blessington community and is not specifically tied to the Parcel B lands. Consequently, it is unreasonable to impose restrictions on the development of Parcel B lands by prohibiting occupancy until all components of the Community Sports facility (including buildings and structures) are available for community use.

As highlighted above, new public infrastructure for the town should be in tandem with new residential development rather than pre-empt development.

The incorporation of 'Phasing Conditions' in the Local Area Plan is in the tradition of the 'Grampian Planning Condition'³. They are in effect, pre-commencement conditions which must be complied with before the development permitted by the planning permission begins.

Guidance from the UK⁴ notes that there must be a reasonable chance of the works happening. Planning Policy Guidance states that pre-commencement conditions should only be used where there is a clear justification, which is likely to mean that the requirements of the condition (including the timing of compliance) are so fundamental to the development permitted that it would otherwise be necessary to refuse the whole permission.

The OPR Practice Note PN03 'Planning Conditions' notes that phasing of development is a key consideration in the design process, furthermore, the development plan/ local area plan may set out phasing parameters that can be highlighted in S247 pre-application consultation. There is special emphasis on pre application consultation for Large-scale Residential Developments (LRD). As such, most well considered applications are likely to set out a suitable phasing schedule, that is to be agreed on foot of planning permission. This development management tool is regularly applied by Wicklow County Council in Action Plans and LRD Permissions. It is also highlighted that Wicklow County Council use other tools including Bonds and Development Contributions to guarantee the delivery of the planning permission in accordance with the terms and conditions of a permission.

³ Derived from the case of Grampian Regional Council v City of Aberdeen (1984).

⁴ <https://www.cpresussex.org.uk/>

The LAPs objective to deliver social infrastructure only by use of a restricted occupancy clause is an overly crude policy tool for broad application (particularly at the policy stage). As noted above, the phased release of dwellings to the market is a more reasonable approach to this achieve this goal.

It is proposed to amend the wording of this text as follows:

~~No dwelling units that may be permitted on foot of the RN1 (Parcel B) zoning may be occupied on a phased basis in agreement with the planning authority until this to ensure the timely delivery of the community sports facility is fully developed suitable for community sports use (including necessary buildings/structures, layout, drainage, surfacing, lighting, access and car parking) and is available for community use;~~

- This community sports facility shall be suitable for the needs of, and shared use by, potential future educational uses on the site reserved for such within this SLO.

3.2.5 CE lands

- *CE zoned lands (excluding the under construction childcare facility) measuring not less than 3.56ha shall be serviced as part of the development of the SLO and reserved for future education use.*

Cairn Homes supports the development of the education campus in the SLO2 area.

3.2.6 Urban Design / Masterplan

- The development of structures along all existing and proposed arterial and link roads should provide a strong sense of enclosure as per Section 4.2.1 of the Design Manual for Urban Roads and Streets, subject to the adequate protection of visual/landscape amenity from Blessington Main Street/Blessington Inner Relief Road to Glen Ding Forest.

Cairn Homes Submission

Cairn Homes shall prepare a detailed masterplan for the area to facilitate the progression of design discussions with the planning authority to support an integrated approach to the next phase of development at Blessington Demesne. The objectives in this policy statement are supported and will form a part of future design proposals for the lands.

3.2.7 Amenity/Masterplan

- Adequate areas should be left free of development to preserve the view from St. Mary's Church to Bastion Wood and Glen Ding Forest.
- The development of appropriate buffer zones/mitigating measures which shall have regard to the setting and curtilage of structures and sites of heritage value, and habitats of biodiversity value including area identified as LBAs.

Cairn Homes Submission

Cairn Homes supports this objective. The MOLA Architects' Masterplan for Blessington Demesne (submitted to Wicklow Co. Co. in December 2024 submission) supports these strategic design criteria, and will form part of future masterplan proposals.

Masterplan Character Areas are envisaged for the development of Blessington Demesne as a sustainable neighbourhood and community.



Figure 3 Blessington Demesne SL02 Masterplan Character Areas (Source MOLA Architects)

Cairn Homes's design team will work with Wicklow County Council to develop a masterplan framework for the area to address the key elements set out in the LAP's objectives.

The site is defined by a series of distinct Character Areas, each contributing unique functions and features to the overall masterplan, which are illustrated in Figure 3. This structured approach to character areas ensures a cohesive and balanced integration of residential, recreational, and educational spaces within the site, while respecting the site's heritage and natural character.

- 1. Blessington Phase 1 (Parcel A):** A newly developed residential area comprising 94 homes, a crèche, and Phase 1 of Town Park. This neighbourhood faces the Town Park and establishes a strong connection with the adjacent green space.
- 2. Blessington Inner Relief Road:** Planning in place for c. 670m of new link road connecting Blessington Demesne to the N81.

3. Town Park: Balance of the Town Park including active open space and athletics track (the latter contingent on the change of zoning to residential in SLO2).

4. Sports Pitches: A significant portion of the site is allocated for sports pitches, located to the west. These are adjacent to the existing pitch and running track, creating a cohesive sports hub.

5. School Campus: Situated at the northern part of the site, the campus offers a dedicated space for educational facilities, with strategic links to surrounding character areas.

6. Blessington Phase 2 (Parcel B): A residential area located west of Oak Drive, currently in the planning stages, designed to integrate with the broader masterplan framework.

7. Blessington Demesne: A proposed residential neighbourhood west of SLO2, fronting the Town Park and the new sports pitches.

8. Blessington Bastion Woods: Another proposed residential area to the east of SLO2, overlooking the Town Park, the School Campus, and the Oak Drive Greenway.

9. Urban Farm and Allotments: Positioned adjacent to Glen Ding Woods, this area integrates with the Glen Ding Woods Greenway and the Bastion Greenway. The proximity to the School Campus provides opportunities for children's educational and recreational activities at the farm.



Figure 4 Masterplan vision for Blessington Demesne (LAP Submission, December 2024) (Source: MOLA)

3.2.8 Phasing – Roads

The Amended LAP objectives for SLO2 seeks to restrict the occupancy of residential development in Parcel A with the BIRR and Parcel B with the Link Road:

- Any new residential development proposals for the RN1 (Parcel A) lands shall be accompanied by proposals for the concurrent development of northern sections of the

BIRR. No dwelling units that may be permitted on foot of the RN1 (Parcel A) zoning may be occupied until the northern section of the BIRR is completed in full and is available for public use.

- Any new residential development proposals for the RN1 (Parcel B) lands shall be accompanied by proposals for the concurrent development of link road between Blessington GAA and the Naas Road. No dwelling units that may be permitted on foot of the RN1 (Parcel B) zoning may be occupied until this road is completed in full and is available for public use.

Cairn Homes Submission

As noted above, the approach to phasing in the LAP should be proportional. Noting the distinction in the Development Plan Guidelines between infrastructure to serve an individual development proposal and that required to serve the community as a whole.

Cairn submits that that the same phasing approach advocated for the delivery of the town park should be applied to the BIRR so that infrastructure for the town is delivered in tandem with residential development rather than pre-empting it. An amendment to the wording of this objective is set out below.

- Any new residential development proposals for the RN1 (Parcel A) lands shall be accompanied by proposals for the concurrent development of northern sections of the BIRR. ~~No dwelling units that may be permitted on foot of the RN1 (Parcel A) zoning may be occupied on a phased basis in agreement with the planning authority until this to ensure the timely delivery of until the northern section of the BIRR is completed in full and is available for public use.~~ A detailed phasing programme shall be submitted for the agreement of the planning authority.

The reference to Link Road delivery in Phase B, is problematic as it affects lands outside Cairn's control in SLO1 (between the Glen Ding Greenway and the R410 Naas Road). This would make the development of Parcel B lands wholly dependent on a Third Party and Wicklow County Council to design, achieve planning consent and construct a distributor road (c.400m). This is submitted as *ultra vires* the power of the planning authority.

DBFL Consulting Engineers has analysed this proposal and confirm that the connection of lands at Blessington Demesne will be adequately served by the connection to the BIRR. For the current phase (Parcel A) DBFL have run the modelling and there was no issue with capacity accounting for the delivery of the BIRR northern section. This future link road is not required at a strategic level (as opposed to local linkage and permeability).

Cairn advocates a more viable and phased approach for road delivery (having regard to its necessity for traffic). It is proposed to amend the wording of this text as follows:

- Any new residential development proposals for the RN1 (Parcel B) lands in the SL02 area shall be accompanied by proposals for the development of link road between Blessington GAA and the Glen Ding Greenway ~~Naas Road~~. Any application for dwelling units shall include a phasing agreement with the planning authority relating to the link road ~~No dwelling units that may be~~

~~permitted on foot of the RN1 (Parcel B) zoning may be occupied until this road is completed in full and is available for public use.~~

3.2.9 Pedestrian/cycling/permeability

The Amended LAP includes specific pedestrian, cycle and permeability objectives for the SLO2 area.

- Development within the SLO shall ensure maximum pedestrian/cyclist permeability into the (under construction) green link that passes through the SLO, and provide strong passive surveillance to this link.
- The following pedestrian/cyclist links shall be provided :
 - from Blessington Inner Relief Road along the southern boundary of the SLO towards Glen Ding Forest (under construction), refer to Map No. 6 Active Travel.
 - from the town park northwards towards the SLO boundary, joining with links within SLO3, refer to Map No. 6 Active Travel. This link should cross watercourses in line with CPO 17.26 of the Wicklow County Development Plan 2022-2028. Elements of this link are under construction.
 - along the boundary of OS2 lands around the Deerpark watercourse, as relevant, as per objective BLESS48.

An extract from Map No. 6 Active Travel, is shown below:

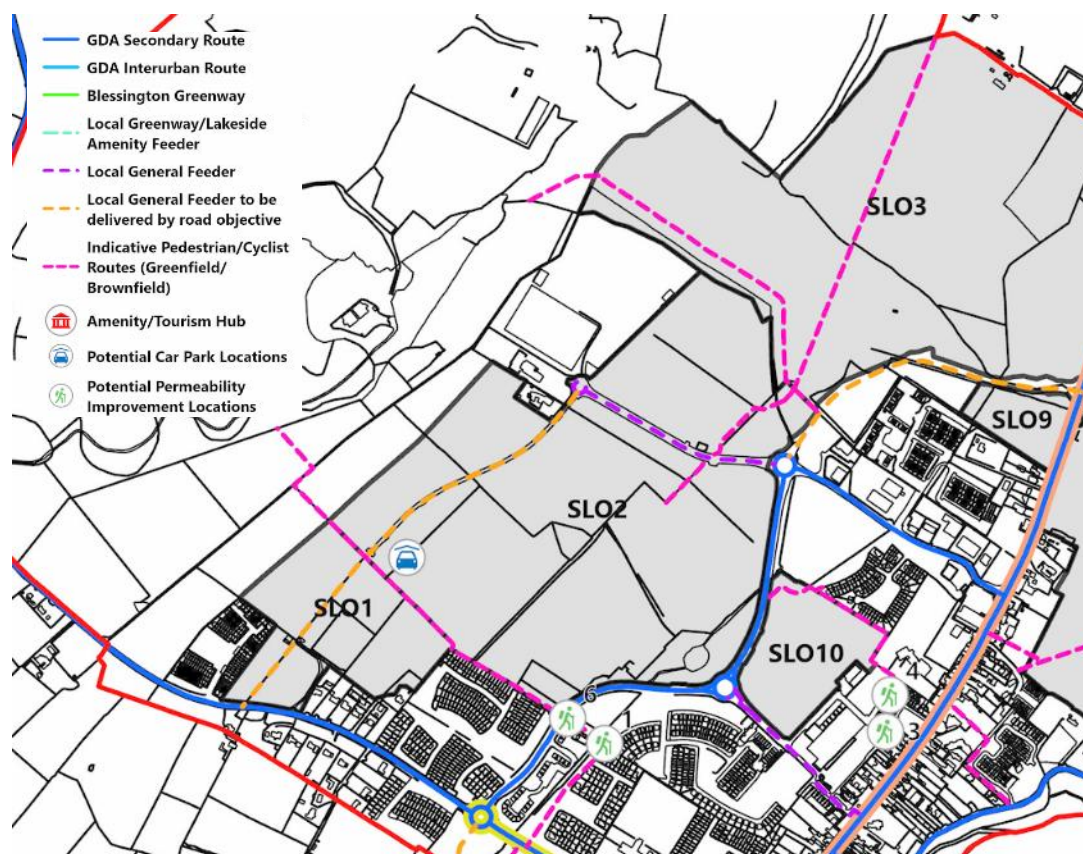


Figure 5 Blessington LAP 2025 Material Amendments – Map 6 Active Travel

Cairn Homes Submission

Cairn Homes' land holding in Blessington Demesne has a key role in delivering a series of Active Travel connections for the town. Cairn supports this objective which provides for further integration and permeability from the BIRR, the new town park and Blessington Demesne with connections to amenities at Glen Ding Forest and proposed 6.9ha AOS at Deerpark (Material Amendment no. 30).

Cairn shall continue to engage with Wicklow County Council Roads Department for development of roads and infrastructure proposals in Blessington Demesne area, in so far as it relates to areas within Cairn's ownership. Any proposed ped / cycle links will be designed in accordance with the latest version of the National Cycle Manual (NCM).

4. MATERIAL AMENDMENTS - POLICY OBJECTIVES

Pages 41 to 56 of the amended Draft LAP set out the policy objectives for the Plan. We briefly note pertinent references Blessington Demesne in tables.

Residential Objectives

Residential Objectives	Implementation	Timeframe
BLESS6 The priority for housing growth shall be the existing built up area of the settlement, on lands zoned 'town centre', and 'existing residential'. In cognisance that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this plan or the associated tables on the number of units that may be delivered within the built up envelope of the town.	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing
BLESS7 Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following two conditions are satisfied: <ul style="list-style-type: none"> - 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated) or after 3 years following adoption of the LAP, less than 50% of the RN1 lands have been activated; - It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached. 	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system	Ongoing

Cairn Homes Submission

BLESS7 has been amended in this Amended in WCC's Material Amendment document. Cairn is generally supportive of these changes as noted in Section 2 of this submission but maintain that the wording remains restrictive and advocate for a softer transition between RN1 and RN2 lands.

Social infrastructure delivery

BLESS24 – BLESS30 refer to Social Infrastructure Policies. BLESS27 refers to lands in SLO2 as follows:

BLESS27	To facilitate and encourage the delivery of new open spaces, parks and multi-purpose sport uses close to the built-up area of Blessington, including covered spaces. In particular, <ul style="list-style-type: none"> - To require the delivery of significant areas of outdoor play space on lands zoned AOS as part of SLO-2 and SLO-4. - To require the delivery of public parks on lands zoned OS1 in SLO-1 and SLO-8. 	To be implemented on an ongoing basis during the lifetime of the plan via the Development Management system, supported by the Council's Climate, Environment, Recreation and Amenity Directorate subject to detailed design and availability of funding mechanisms and through their delivery in tandem with development proposals on privately owned sites.	Medium term (developed led)
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Cairn Homes Submission

Cairn Homes supports the delivery of Social Infrastructure and Recreation Amenity in the Blessington Demesne area. As highlighted above, the issue of implementation, phasing and funding are crucial to ensure these facilities can be delivered in a viable manner in tandem with residential development.

Heritage, Biodiversity and Green Infrastructure Objectives

BLESS38 refers to the development of enhanced or new greenways and amenity walks, including lands at Blessington Demesne.

BLESS38	<p>To promote and support the development of enhanced or new greenways and amenity walks at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links:</p> <ul style="list-style-type: none"> - Poulaphouca Reservoir (Blessington Greenway/proposed Blessington eGreenway) - Glen Ding Forest - Wooded areas at Doran's Pit - Blessington Demesne (Town Park) <p>The enhancement of existing, and development of new, recreational facilities along the lakeshore area, such as walking routes, car parking areas, signage, changing / toilet facilities and water based clubs/facilities, will be considered subject to compliance with the provisions of the EU Habitats Directive and other planning considerations.</p>	<p>To be pursued on an ongoing basis during the lifetime of the plan through the projects and programmes of the Municipal District team, the Council's Climate, Environment, Recreation and Amenity Directorate, the TRO and the Council's Heritage and Biodiversity Officers, subject to detailed design and availability of funding mechanisms and/or through their delivery in tandem with development proposals on privately owned sites</p>	
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Cairn Homes Submission

Cairn Homes supports the delivery of amenities for the residential community at Blessington Demesne and shall continue to work with WCC to facilitate and incorporate detailed design proposals in the area.

New regional/distributor roads and road improvements

BLESS44 (delivery of new regional/distributor roads and road improvements) and BLESS 48 (Care Park on AOS lands) are also relevant:

BLESS44	<p>Support the implementation of the recommendations of the Transport Assessment with regard to the delivery of new regional/distributor roads and road improvements², including (but not limited to):</p> <ul style="list-style-type: none"> a) The completion of the Blessington Inner Relief Road (northern and southern sections). b) The provision of a road objective through Doran's Pit, linking the N81 to Kilbride Road. c) The completion of a partly constructed link road in Blessington Demesne, linking the GAA grounds/educational/care facilities with Naas Road. d) The delivery of the N81 Tallaght to Hollywood Cross Road Improvement Scheme. Any development within the preferred route corridor will be assessed for acceptability having regard to the potential effects on the future viability of the proposed road. Active travel routes from the town centre to Glen Ding should be facilitated in the final design of the N81 Tallaght to Hollywood Cross Road Improvement Scheme. 	<p>The delivery of these road improvement projects and programmes shall be actively progressed by the Council's Roads and Transportation Unit during the lifetime of the plan, subject to final detailed designs and availability of funding mechanisms, including public funding (Council / NTA / TII) and through their delivery in tandem with development proposals on privately owned sites.</p>	<ul style="list-style-type: none"> a) Short term (development led) b) Medium term (development led) c) Medium term (development led) d) Long Term
BLESS48	<p>Support the development of additional car parking areas within the plan area, including but not limited to:</p> <ul style="list-style-type: none"> - A public transport park and ride in Blessington along the N81. - A car park in Doran's Pit for potential greenway parking and access to adjacent woodland. - A car park on Active Open Space lands in Blessington Demesne to serve those lands and as an alternative car park for access to Glen Ding. 	<p>The delivery of these road improvement projects and programmes shall be actively progressed by the Council's Roads and Transportation Unit and Climate, Environment, Recreation and Amenity Directorate during the lifetime of the plan, subject to final detailed designs and availability of funding mechanisms, including public funding (Council / NTA / TII) and through their delivery in tandem with development proposals on privately owned sites.</p>	<p>Medium Term</p>

Cairn Homes Submission

Consistent with its position on Social Infrastructure and Amenity/recreation facilities, Cairn Homes supports the delivery of road infrastructure in the Blessington Demesne area. As highlighted above, the issue of implementation, phasing and funding are crucial to ensure these facilities can be delivered in a viable manner in tandem with residential development, rather than as pre-conditions that prevent development progressing.

5. MATERIAL AMENDMENT 16 - OTHER INFRASTRUCTURE OBJECTIVES

Material Amendment No. 16 'Other Infrastructure Objectives' includes additional objectives in respect of Water Protection as follows:

Water Protection

The Poulaphouca Reservoir is a critical source of raw water supply to the populations of Dublin, Kildare and parts of Wicklow. Significant measures are required to be taken to protect the water quality in the reservoir, including the management of surface water runoff in adjacent towns and villages.

Uisce Éireann recommends the use of the hierarchy of discharge outlined in the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" to complement the approach to surface water management set out in the Wicklow County Development Plan.

In particular, Uisce Éireann encourages a specific focus on the water quality of surface water runoff collected in Blessington town and discharged either directly to the reservoir or to watercourses which drain to the reservoir. This is applicable to both new developments and to any planned improvements to existing urban spaces.

BLESS-XX: *To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Drinking Water and Water Framework Directives. New developments which could pose an unacceptable risk to drinking water sources will not be permitted.*

BLESS-XX: *To support and facilitate the improvement of the quality of surface water runoff that directly (or indirectly) will reach Poulaphouca Reservoir. This shall be applied to both new/expanded developments and to any planned improvements to existing urban spaces. In this regard, developments shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024.*

This text is read in conjunction with the new Infrastructure Table on p.57 of Material Amendments Document.

Site ID	Current servicing status				Additional infrastructure needs to support full development of site
	Water Supply	Wastewater Infrastructure	Surface Water Infrastructure	Roads & Transportation	
SLO2 Blessington Demesne (west) (expanded to include SLO8)	1	2	2	2	Roads (1) completion of link road within site to connect Oak Drive to Naas Road – Developer +WCC (2) completion of northern section of BIRR – Developer +WCC Water Services – services available in Oak Drive - developer delivered Community facilities (school site) – land reservation Amenity Park – Developer +WCC Sports Park – Developer +WCC

1 = serviced, 2 = serviceable, 3 = unserviced

Cairn Homes Submission

DBFL Consulting Engineers have reviewed this objective on behalf of Cairn Homes. We have also reviewed the submission of Uisce Éireann on the Draft LAP.

The UE submission is favourable, indicating that there is currently capacity for both water and foul systems. While a future water supply project has been identified for the area, the main point of the UE submission is that there is existing capacity.

6. CONCLUSIONS

Cairn Homes Properties Ltd welcomes the Material Amendments to the Draft LAP. It incorporates important changes to Special Local Objectives (SLO) 2 and SLO8 in a new SLO2 for Blessington Demesne which supports a more integrated and proactive framework for the development of the area.

The increase in Priority 1 zoning is a welcome and necessary change to plan. It is submitted that these changes are in accordance with the new NPF which requires Local authorities to ensure sufficient zoned and serviced land is available at appropriate locations capable of meeting the housing needs of the targeted population.

The Amended Draft incorporates a Priority zoning in accordance with the NPF and Development Plan Guidelines. The criteria for allowing development in Priority 2 lands is less rigid and accounts for a zoning phasing strategy that is more resilient for unforeseen impediments and could rule out significant areas from development.

The amendments proposed in this Amended LAP will be vital to achieving the strategic goals of the plan and the early delivery of sustainable residential neighbourhoods that integrate with the town as it continues to grow.

Extensive parks and active open spaces will offer high-quality amenities, enriching the lives of both current and future generations in Blessington Demesne. The vision illustrated in this submission has been informed by ongoing discussions and engagement with local sports and community organisations in Blessington.

However, it is vital that the Objectives for Social, Recreational and Road Infrastructure do not impose a restrictive phasing regime that undermines the positive aspects of the Amended LAP.

The approach to phasing should be proportional. The burden of delivering public open space or roads within a housing estate are entirely different to providing infrastructure for town as a whole. A phasing approach that allows release of complete housing in stages to the market is proposed. This is consistent with OPR Guidance that recognises, occupancy restrictions can be addressed by way of percentages or by agreement rather than absolute bans on residential occupation prior to completion of major infrastructure projects. Overall, minor amendments, that more nuanced approach to phasing is proposed.

As the key stakeholder for delivery of this LAP, Cairn Homes will continue to work with Wicklow County Council to bring forward development proposals with associated infrastructure and amenity investments on foot of the adoption of this plan.



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