

31 March 2026

Administrative Officer
Planning Department
Wicklow County
Council County Buildings
Whitegates
Wicklow Town
A67 FW96

SLR Project No.: [REDACTED]

Client Reference [REDACTED]

BY EMAIL: RZLT@wicklowcoco.ie

RE: BLESSINGTON - RZLT DRAFT 2027 MAP SUBMISSION: BELGARD ESTATES LTD.

This submission is made on behalf of Belgard Estates Limited (BE) (“the Landowners”) in respect of their landholding at Doran’s Pit, Blessington, Co. Wicklow, as mapped in **Figure 1**.

The entirety of Site 1 now appears within the area shown as “in scope” on the 2027 Draft RZLT Map.

BE requests the removal of these lands from the 2027 Draft RZLT Map, pursuant to Section 653D of the Taxes Consolidation Act 1997.

This letter sets out:

- Site information and zoning;
- Updated local policy context, including the Blessington LAP 2025–2031;
- An assessment of the lands against the statutory criteria in Section 653B TCA 1997; and
- The reasons why the lands do not qualify as ‘in scope’ for RZLT.

1.0 Site Location and Context

BE’s landholding is situated north-east of Blessington, adjacent to the N81, and historically associated with sand and gravel extraction activities. **Figure 1** identifies the landholding as Site 1.

Site 1 appear on the 2027 Draft RZLT Map and lies within and adjoining the wider area referred to as ‘Doran’s Pit’ in the Blessington Local Area Plan 2025–2031, specifically associated with the LAP’s SLO4 mixed-use development area.

- Development of a pedestrian and cyclist-only street incorporating a two-way segregated cycle track through the SLO4 lands.
- Retention and protection of OS2 'Natural Areas',
- Preparation of a management plan for the phased regeneration of plantation woodland into native woodland as part of any development proposal.

None of the above infrastructure required under SLO4 has been delivered to date.

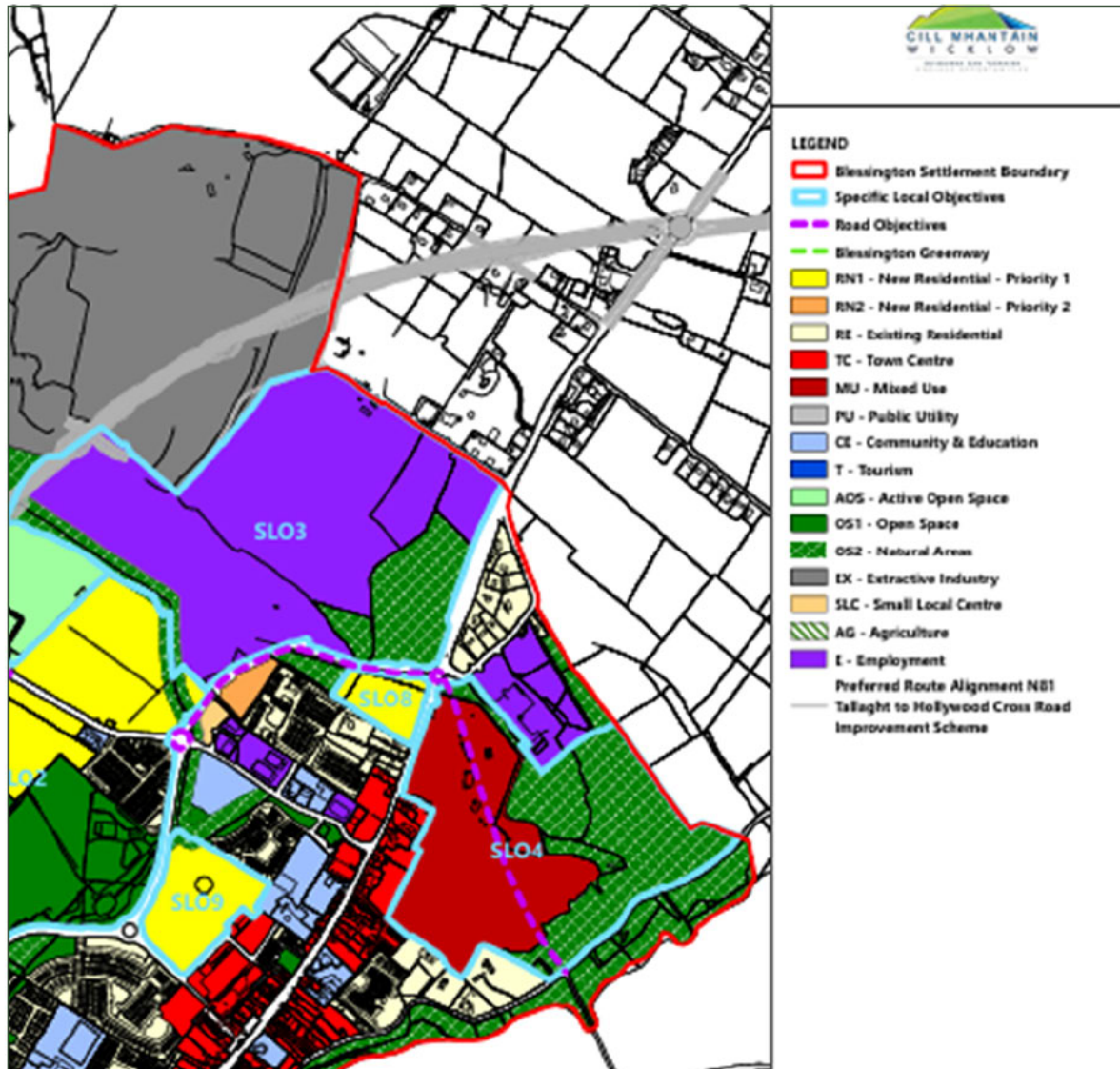


Figure 2 LAP Zoning Objectives Map

The LAP does not describe this land as serviced residential land ready for development. Instead, it:

- Places emphasis on road connections that do not yet exist (See **Section 2.1.1** below);
- Requires active travel routes through and across SLO areas that have not been delivered;
- Requires at least c.5 ha of active open space / sport uses and ancillary facilities



This zoning classification, when read in conjunction with the LAP, indicate that the lands are not considered to be readily serviceable, or capable of supporting residential development without significant new infrastructure being provided.

2.1.2 New Road Links Required

The LAP places significant emphasis on road network restructuring, including:

- Completion of the Blessington Inner Relief Road (BIRR)
- Delivery of a new road link between the N81 and Kilbride Road/Knockieran Bridge, traversing the wider Doran's Pit lands (SLO4)
- A requirement that residential development cannot proceed until these road objectives are completed

These requirements are set out clearly in multiple LAP sections and SLO4 text.

2.1.3 Phasing

In relation to SLO4, the LAP states that

‘For the avoidance of doubt, residential development within the area shall be considered RN2 ‘New Residential Priority 2’ for the purposes of phasing and in relation to the Core Strategy as set out in the Wicklow County Development Plan.’

In relation to zoning for residential development, page 38 of the LAP also states that

‘Edge of centre’ locations will be considered the priority location for such new greenfield residential development and will generally be zoned as ‘New Residential - Priority 1’ (zoned RN1) while more ‘out of centre’ housing sites (zoned ‘New Residential - Priority 2’ RN2) will only be considered where Objective BLESS7¹ is satisfied and on the basis of integrated housing / community facilities / open space schemes that can be well connected to the existing built up area.

The LAP’s phasing restrict RN2 development until at least 75% of RN1 lands are activated, or 3 years after adoption if RN1 lands remain dormant. There is no evidence that RN1 lands in this settlement have reached activation thresholds that would allow RN2 lands (including parts of the landowners site) to be brought forward.

These LAP conditions demonstrate the lands should not be considered reasonably serviceable for RZLT purposes.

2.1.4 Water Services

The LAP states that the Blessington WWTP has been upgraded to c. 9,000 PE, intended to meet the CDP’s Core Strategy targets, however due to the dynamic nature of capacity at the plant it is understood that, even with the upgrade, the Blessington Wastewater Treatment Plant may already be operating at or close to full capacity, indicating that additional residential loading cannot be accommodated.

¹ BLESS7 states that *Notwithstanding the zoning / designation of land for new ‘greenfield’ residential development (RN), permission will only be considered for RN2 Priority 2 lands where 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.*



In addition to the ongoing capacity issue at the Blessington WWTP, there is also a lack of a local foul sewer connection adjacent to the subject lands. The nearest foul sewer lies ~0.5 km south of Site 1, requiring significant off-site works across third-party land.

3.0 Assessment Against Section 653b TCA 1997

Section 653B requires that, for land to be considered 'in scope' for RZLT, it must not only be zoned for residential or mixed-use development, but must also be serviced, or reasonably capable of being serviced, with road access, footpaths, foul sewer, surface water drainage and potable water supply. While the zoning element may be met, the Blessington lands do not meet the servicing requirements. The below outlines the reasons.

3.1 Road Access

The Blessington LAP 2025–2031 identifies several road objectives that must be delivered before development in this part of Blessington can proceed, including:

- Completion of the Blessington Inner Relief Road.
- A new road linking the N81 to Kilbride Road / Knockieran Bridge, running through the wider Doran's Pit area (SLO4). The LAP states that this link must be constructed before any new development is occupied.

None of these road elements currently exist. The previous submission on these lands established that access to Site 1 would require significant upgrades to the N81. This condition remains unchanged and accordingly, the lands do not satisfy the road access requirement of Section 653B.

3.2 Footpaths, Pedestrian and Cycle Infrastructure

The LAP requires the delivery of new pedestrian and cycle routes across the SLO4 lands, including:

- A pedestrian- and cyclist-only street with a segregated cycle track.
- New active travel links connecting SLO4 with the town centre, including through Opportunity Site OP8.

These routes do not exist today. As footpath access is a mandatory criterion under Section 653B, the lands cannot be viewed as serviceable.

3.3 Surface Water Drainage

The nearest surface water sewer lies approx. 400 m south of Site 1 and lacks adequate capacity to support development. This restricts the feasibility of providing compliant surface water drainage.

3.4 Foul Sewer Drainage

Although the LAP notes that the Blessington Wastewater Treatment Plant has a theoretical capacity of c. 9,000 PE², foul sewer infrastructure is not present on or adjacent to the subject lands. The nearest connection point lies approximately 500 m south along the N81 and would require substantial off-site works across third-party lands. For these reasons, the lands do not satisfy the foul drainage requirement of Section 653B.

² Although recently upgraded to 9,000 PE, it is understood that this capacity is dynamic and may already be committed to via approved developments.



3.5 Water Supply

While the LAP indicates that water supply capacity is generally available for the plan period, this alone does not render the lands 'serviceable' in the absence of road access, footpaths, and drainage infrastructure.

3.6 LAP Phasing Requirements (RN1 / RN2)

Parts of the lands are zoned RN2 – New Residential (Priority 2). Under the LAP: RN2 development can only proceed when 75% of RN1 lands are activated, or After 3 years if less than 50% of RN1 lands have been activated. There is no evidence that RN1 activation thresholds have been met. The LAP also requires significant community, open space, and road infrastructure to be delivered within SLO4 before development can occur. None of this is in place.

3.7 Summary

The lands do not have the required road access, footpaths, foul sewer or surface water drainage infrastructure. Neither are they reasonably capable of being serviced without substantial enabling works that are neither planned nor underway. Accordingly, the Blessington lands do not satisfy the servicing criteria set out in Section 653B of the Taxes Consolidation Act 1997 and should not be included on the 2027 Draft RZLT Map.

4.0 Conclusion

BE's Blessington lands (Site 1) are included on the 2027 Draft Residential Zoned Land Tax Map. This submission demonstrates that, although zoned for future mixed-use development under the Blessington Local Area Plan 2025–2031, the lands do not meet the statutory servicing or serviceability criteria required by Section 653B of the Taxes Consolidation Act 1997. The key reasons, as set out, can be summarised as follows:

- Large amounts of road infrastructure required under the Blessington LAP (including the new N81-Kilbride Road link and completion of the Blessington Inner Relief Road) have not been delivered.
- Required footpath, pedestrian and cycle infrastructure through the wider SLO4 lands, including the LAP-mandated spine street, have not been provided.
- No surface water drainage infrastructure of adequate capacity exists proximate to the lands, and significant OS2 'Natural Areas' designations restrict feasible drainage solutions.
- A foul sewer is not located adjacent to the site and connection would require extensive off-site works across third-party lands.
- The Blessington Wastewater Treatment Plant may be operating at or close to full capacity in 2026, indicating that additional residential loading cannot be accommodated at present.
- LAP phasing policies require activation of RN1 lands before RN2 lands can be developed, and none of the LAP requirements for SLO4 (including community and open space delivery) are in place.

Collectively, these constraints confirm that the lands cannot be categorised as serviced, nor as reasonably capable of being serviced, as required under Section 653B.



5.0 Formal Request

In accordance with Section 653D of the TCA 1997, the Landowners request that Site 1 in Blessington, Co. Wicklow, be removed from the 2027 Draft RZLT Map, on the basis that the lands do not meet the servicing criteria under Section 653B; and they cannot be considered serviceable during the lifetime of the map without substantial, enabling infrastructure.

This submission is supported by the analysis contained in this submission and the planning context set out in the Blessington Local Area Plan 2025–2031.

Please do not hesitate to contact the undersigned should any further clarification be required.

Yours Sincerely,

SLR Environmental Consulting (Ireland) Ltd

[REDACTED]

[REDACTED]
[REDACTED]

Office phone [REDACTED]
Mobile [REDACTED]
Email: [REDACTED]



