Section 4 Summary and Assessment of submissions

Section 4.2 Elected Members

4.2.1 Councillor Gerry O' Neill

Part B.5 Community Development

No.	Name	Issues Raised
	Cllr Gerry O'Neill Ref 223019	 That the land zoned in the 2013-2019 Blessington LAP for the extension of the graveyard at Burgage More, Blessington should remain in place for the new 2025 plan. There should also be land provided for a car park at the graveyard.

Chief Executive Response

The concerns with regard to the need to expand the existing and/or provide a new cemetery are noted. The Social Infrastructure Audit identifies that cemeteries/burial grounds in the settlement of Blessington are near capacity and there is a need for additional cemetery space within the Blessington area.

CPO 7.55 of the Wicklow County Development Plan 2022-2028 states that it is an objective of Wicklow County Council 'To facilitate the development of new, improved or expanded places of worship and burial grounds including natural burial grounds at appropriate locations in the County, where the demand for the facility has been demonstrated.'

This objective applies countywide including the Blessington plan area and surrounds. This objective does not require burial grounds to be developed within the built up area of a settlement and supports the development of such uses in the vicinity of Blessington including outside the LAP boundary. In this regard it is noted that many new cemeteries are now locating outside settlements, for example Kilternan Cemetery Park in South Dublin, which is an excellent example of a modern cemetery park noting its rural location and peaceful surrounds and where there is little development pressure from other active land uses.

It is noted that cemeteries are open for consideration on lands zoned for Mixed Use (MU) and Community & Education (CE), and therefore a new cemeteries or a cemetery car park are not ruled out for the Council's land at Burgage. However, the options for the future development of these lands have not been finalised at this time.

Chief Executive's Recommendation

No change to the Draft Blessington Local Area Plan 2025-2031.

Part B.1 Town Centre Regeneration

B1.1 Blessington Town Centre First Plan

No.	Name	Issues Raised
242	Cllr Gerry O'Neill	■ Cllr O'Neill opposes the proposal to remove parking and pedestrianize the
	Ref 225429	Market Square Blessington; hard pressed business people who already pay
244	Cllr Gerry O' Neill	high rates and tax's may well be forced to close and is certainly no incentive
	Ref 231715	for the new owners of the Ulster Bank ,Downshire Hotel or other business people in the area.
		■ The proposal by Blessington Town Centre First Plan (draft ,p23) was never suggested to business people in the immediate area and would be unfair without consultation.

The LAP clearly details that the regeneration of the town centre, including public realm improvements in and around Market Square, is a key objective and is essential in order to maintain the vibrancy and vitality of the town centre as the heart of the settlement.

With the future diversion of traffic flows onto the completed BIRR, an opportunity exists to carry out significant enhancement to Blessington Main Street and Market Square, with the objective to make the area more pedestrian friendly by reducing through traffic flows, reducing the area of the main street given over to traffic and vehicles and instead providing safe pedestrian and cycling facilities, more pleasant spaces to people to dwell and recreate and more opportunities to do business due to a resultant increased footfall.

The LAP does not provide the detail with respect to the design of any future public realm improvements, including any changes to car parking that might be proposed as part of any such future project. Figure B.1.1 is indicative only and should not be considered a final design as outlined in the draft LAP. In this regard the plan only sets out the aims, objectives and standards that any future public realm projects will be required to meet, and any future programme of public realm improvement will be subject to the necessary consent process including where necessary public consultation. This would be the appropriate time for residents and local business owners/operators to give input with respect to changes that might be proposed close to their property.

Furthermore, objective BLESS48 of the Draft LAP supports the development of multiple additional car parking locations that could compensate for any rationalisation of car parking on Blessington Main Street/Town Centre thereby ensuring that the level of car parking in the town centre is not reduced as a result of any improvements to the public realm.

Chief Executive's Recommendation

No change to the Draft Blessington Local Area Plan 2025

4.2.2 Councillor Jason Mulhall

Part A Strategy

248 Cllr Jason Mulhall Ref 212745

Submitted that the draft LAP for Blessington is a well-thought-out document, with clear considerations for the different scenarios across various land use objectives. However, for the final document, Cllr Mulhall recommends the following:

Clarify the Purpose and Title of the Document

Submitted that the title Blessington Local Area Plan is misleading and should be stated as a land use zoning framework.

It should be evident in the document that:

- The zoned lands are largely in private ownership, and there is no requirement for individuals or developers to commit to the proposed uses.
- The LAP does not have supporting funding or specific timelines for implementation.

Enhance Zoning Colour Scheme

Requested that the Zoning colour scheme is enhanced. Submitted that the current colour scheme is confusing with regards to existing facilities, and new zoning objectives for CE, AOS, and OS1 zones. Differentiating these by using distinct colors or patterns would provide for clarity.

Residential Development

Although the intent behind RN1 and RN2 zoning is well understood, the LAP needs to incorporate, criteria and expectations related to the sequencing of RN1 development in a way to ensure RN2 is not hindered and impacted negatively.

Introduction of a RN3 Category

A RN3 category could be introduced, taking into consideration and planning for the need for potential future housing that might be required before the end of the proposed plan. This would provide flexibility in addressing future residential demands.

Cross County Co-ordination

The plan overlooks the impact of residential development within Kildare on the Blessington community. To address this, the lands in Kildare should be included in consultation with Kildare County Council and zoning in Kildare's Development Plan should align with Blessingtons needs. The existing Blessington LAP boundary cuts off residential and other developments within County Kildare, which would clearly be part of the everyday functional relationship with the Blessington community.

Noted that there are number of towns in Ireland where cross county collaboration has been implemented for example Drogheda (Louth and Meath), Athlone (Westmeath and Roscommon), Carrick on Shannon (Leitrim and Roscommon), and indeed Bray (Wicklow and Dublin).

Chief Executive Response

With regard to the title of the plan, a Local Area Plan is a statutory document pursuant to Section 20 of the Planning & Development Act 2000 (as amended). It is recognised that under the new Planning and Development Act 2024, the title of such plans will change however while this new planning legislation was signed into law by President Higgins on 17 October 2024, it is not yet in force. Until such time the title Local Area Plan will apply.

The residential zoning provisions of the draft LAP have been carefully calibrated to ensure compliance with the NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the population and housing targets of the Core Strategy, as set out in the County Development Plan.

With regard to the concerns raised regarding the RN2 zoned lands been hindered or impacted upon negatively by the sequencing and phasing of the RN1 zoned lands it should be noted that the development of phase 2 'RN2' lands is not solely linked to the full / majority development of RN1 lands and the key factor affecting the developability of RN2 lands is consistency with the housing targets of the Wicklow Core Strategy, which at this time are met. However, it is noted that the section of the Draft LAP relating to phasing under Part B.8 Zoning states the following with regard to the development of RN1 zoned lands:

"In order to ensure a long term supply of zoned residential 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 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 conditions are satisfied:

- <u>75% of Priority</u> 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- 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 this regard it is noted that Objective BLESS7 does not make reference to 75% of the Priority 1 lands been activated but states "Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated)" which would suggest that all of the RN1 lands need to be activated prior to permission been considered on RN2 lands. In this regard it is recommended that BLESS7 is amended as follows:

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 conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- 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.

A the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

Therefore, with regard to introducing a third residential development phase RN3, this would effectively act as a land bank for future residential development beyond that envisaged in the draft LAP and result in the zoning of additional excess residential lands which would be contrary to The Development Plan Guidelines of June 2022, the NPF, RSES and Wicklow County Development Plan requirements and objectives as noted above. In

addition the NPF 'Tiered Approach' to zoning and NPO72c, where land is not serviced, and not likely to be serviced within the lifetime of the plan, they should not be zoned.

In the drafting of the LAP the existing and future projected population of the area of Blessington located within the boundary of Kildare County Council was included in the existing and future population figures in the Social Infrastructure Audit. The land use zonings in this area of Blessington are under the remit of Kildare County Council and were adopted as part of the 2023-2029 Kildare County Development Plan process. Wicklow County Council gave full consideration to the land use zonings located in the Kildare jurisdiction of the settlement of Blessington in the crafting of the draft LAP.

With regard to the drafting of a cross county plan, is noted that the area of Blessington located in the jurisdiction of Kildare County Council is currently relatively small in comparison to the area of the settlement located in the jurisdiction of Wicklow County Council. There are a number examples of town plans of towns in Ireland where cross county collaboration has been implemented however it is noted that these plans generally relate to much larger settlements in excess of 20,000 people or involve a settlement where greater distribution of the settlement across the two jurisdictions. Wicklow County Council and Kildare County Council work is close collaboration with one another and the Blessington LAP has been drafted in consultation with Kildare County Council. It is acknowledged that in the future there may be a need to establish a joint plan for Blessington between Kildare and Wicklow if the population of the town significantly increases and/or the portion of the settlement in Kildare significantly increases.

For clarity the zoning provisions of the Kildare County development plan, as they relate to Blessington can be shown on the plan maps.

With regard to the colours used on the zoning maps every effort is made to ensure that the all maps associated with the Draft Plan area as clear and easy to follows as possible. It is recognised that the zoning maps have to convey a lot of information on one drawing. The zoning maps are underlayed with the most up to date OS mapping to show existing development in the settlement with undeveloped/greenfield sites generally shown with no building outline. It is noted that the maps are often easier to view in hard copy format printed at least A3 or online where persons viewing them can zoom in and out to view in detail particular sites they are interested in.

Chief Executive's Recommendation

Amend the LAP as follows:

Amend Objective BLESS 7 as follows:

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 conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- 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.

And:

Amend Map 1 to include zoning objectives for Blessington from Kildare County Development Plan.

Part B.3 Economic Development

No.	Name	Issues Raised
248	Cllr Jason Mulhall	The MU zoning and SLO4 areas have remain undeveloped since the 2013 LAP. If
	Ref 212745	this condition persists, the community forfeits potential residential, recreational, or economic development. The LAP should provide for contingency plans regarding the underutilization of MU zoned lands to ensure benefits to the community.

Chief Executive Response

A land-use plan has no direct role in the purchase of and development of lands in the LAP area. This is outside the remit of the LAP, however, it is considered that this plan's role is to ensure the availability of zoned land for various types of development need to support the sustainable development of the settlement and to include objectives facilitating this development in line with Blessington's status as a Level 3 Settlement in accordance with National, Regional and Local Policy.

Please also refer to Part B.8 Zoning, SLO4 –Doran's Pit of this report.

Chief Executive's Recommendation

No change to draft Blessington Local Area Plan 2025.

Part B.4 Tourism

B.4.1 Greenway

24	18	Cllr Jason Mulhall	The rejection of the Blessington eGreenway by An Bord Pleanála (ABP) has
		Ref 212745	raised concerns regarding tied infrastructure plans. Suggests revisiting car
			parking locations, community facilities, and economic opportunities associated
			with eGreenway to identify a standalone solution following the rejection of the
			Blessington Greenway.

Chief Executive Response

While the recently proposed greenway extension project has been refused consent by An Bord Pleanala, the Council is committed to enhancing tourism infrastructure and attractions in the Blessington area, particularly those related to the Blessington Lakes and those that bring benefit to the villages surrounding the lakes, subject to the utmost protection of the environment, including water quality and natural habitats. Options for alternative projects around the Blessington Lakes that capitalise on, but appropriately protect, this asset are currently being reviewed.

In this regard it is recommended that all references in the draft plan for the Blessington Greenway should be amended to '........future tourism projects in the Blessington Lakes area...'

It is also recommended that any text relating to the specifics of the refused greenway project should be reviewed and amended as necessary.

The provisions of the draft LAP, such as those relating to visitor centres, visitor car parking etc are proposed to be maintained in the plan, even in the absence of current greenway project, as such facilities would support a wide range of tourism project and activities.

Chief Executive's Recommendation

Amend the plan as follows:

All references in the draft plan for the Blessington Greenway should be amended to '......future tourism
projects in the Blessington Lakes area...'

Any text relating to the specifics of the refused greenway project should be reviewed and amended as necessary

Part B.5 Community Development

248	Clir Jason Mulhall Ref 212745	For CE and AOS zoning, clear objectives should ensure infrastructure meets community needs. Suggested additions include:
		 Recreational Facilities: Athletics track, playing pitches, basketball courts. Community Facilities: Scouts den, Community centre, Community allotments. Public Spaces: Dog park, Playgrounds, Dedicated bike track. Active Open Space (AOS) and Open Space (OS1) Ensure adequate land is zoned for AOS to meet community needs and that OS1 zoned land can be readily used.
		The previous draft LAP had identified an area for cemetery use, which is missing on the current draft. This ought to be reinstated appropriately under CE zoning, with deliberation from relevant authorities who would identify an appropriate size determination.
249	Clir Jason Mulhall Ref 235300	Cllr Mulhall outlines his support that a sufficient land parcel in the town of Blessington is designated to accommodate a 400m running track and associated facilities for track and field events. This facility would be lead by the Lakeshore Striders Athletic Club, but available to all within the community, such as Community Games, schools etc. This should be added as a specific objective of the LAP.

Chief Executive Response

Sports and Community Facilities

It should be noted that the actual delivery of AOS (Active Open Space), the purchase of lands and provision / development of sports facilities / playgrounds / dog parks etc is not the purpose of a LAP. as set out in the introduction to the LAP:

The role of land use plan is to put in place a framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan.

This is also the case with regard to the development of lands zoned OS1 and CE.

The Social Infrastructure Audit has identified that there is a shortfall of equipped playspaces in the settlement and it is recognised that there is currently no dog park. Casual play spaces and equipped play spaces are most usually permissible under an OS1 'Open Space' land use zoning objective. The Social Infrastructure Audit identified that circa c.27.2ha of AOS and c13.6ha of OS1 (total 40.8ha) would be required to accommodate sports facilities, recreational amenity areas and play spaces to serve the projected 2031 population of Blessington (Co. Wicklow and Co. Kildare) and its catchment. This figure includes existing AOS and OS1 spaces. A total of 46ha has been zoned OS1 and AOS across the draft LAP area comprising of c.23ha AOS and c.23ha OS1. An additional c3.3ha of land is specifically reserved for AOS on SLO4, bringing the total area of lands specifically reserved for AOS to c.27ha. It is further noted that active sports facilities can be developed on TC, CE and other MU lands and not exclusively on AOS zoned lands.

The draft LAP has located proposed AOS on sites where the development of such facilities would not have an adverse impact on any protected sites while still located closes to the town centre and existing and proposed residential areas and schools. OS1 lands have been zoned to complement the location of existing OS1 facilities and close to residential areas and the Town Centre.

In this regard the recent opening of phase 1 of the new town park developed by Cairn Homes is a positive and much welcomed asset to the town by Wicklow County Council and includes an excellent new playground with greenspaces and walks.

It is noted that under the 2013 Blessington Local Area Plan a total of c.25ha of AOS was zoned. The 2013 Blessington LAP had a 2022 target population of 7,500 for the settlement of Blessington (Co. Wicklow). The target population for the settlement of Blessington (Co. Wicklow) under the draft LAP to the year 2031 is lower at 6,313 with c.27ha specifically reserved for the development of AOS.

Cemeteries

The concerns with regard to the need to expand the existing and/or provide a new cemetery are noted. The Social Infrastructure Audit identifies that cemeteries/burial grounds in the settlement of Blessington are near capacity and there is a need for additional cemetery space within the Blessington area.

CPO 7.55 of the Wicklow County Development Plan 2022-2028 states that it is an objective of Wicklow County Council 'To facilitate the development of new, improved or expanded places of worship and burial grounds including natural burial grounds at appropriate locations in the County, where the demand for the facility has been demonstrated.'

This objective applies countywide including the Blessington plan area and surrounds. This objective does not require burial grounds to be developed within the built up area of a settlement and supports the development of such uses in the vicinity of Blessington including outside the LAP boundary. In this regard it is noted that many new cemeteries are now locating outside settlements, for example Kilternan Cemetery Park in South Dublin, which is an excellent example of a modern cemetery park noting its rural location and peaceful surrounds and where there is little development pressure from other active land uses.

It is noted that cemeteries are open for consideration on lands zoned for Mixed Use (MU) and Community & Education (CE), and therefore a new cemeteries or a cemetery car park are not ruled out for the Council's land at Burgage. However, the options for the future development of these lands have not been finalised at this time.

Chief Executive's Recommendation

No change to draft Blessington Local Area Plan 2025.

Part B.7 Infrastructure

No.	Name	Issues Raised
248	Cllr Jason Mulhall	Blessington Inner Relief Road (BIRR)
	Ref 212745	 Development along the BIRR route should be developed further only in tandem with the completion of the relief road network, including both the Kildare and Wicklow sections. Furthermore, road connections from Blessington GAA roundabout to the Naas Road should be prioritized.
		 Public Transport Public transport through Blessington is very poor. The situation may improve under Bus Connects, but the LAP needs to have goals for the following: Expanding 65 bus route services and integrating Local Link services. Advocating for specific goals tied to Bus Connects' timeline and delivery.
		 Parking and Pedestrianisation Parking is a persistent issue in Blessington. While additional parking is welcomed, it should be strategically located to encourage use and support pedestrianisation. Enhance the town centre by reducing car dominance, creating people-friendly spaces, and improving connectivity between the Main Street and surrounding areas.

Chief Executive Response

Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure.

The Local Authority is committed to the completion the Blessington Inner Relief by continuing to work with the various transport agencies and developers along the route to progress this project in the short - medium term. With regard to the completion of the BIRR in tandem with any further development along its route, it is noted that the undeveloped lands along the final sections of the BIRR are largely reliant on its construction for access. It is noted that recent residential developments permitted to date along this route have included Transport Impact Assessments as part of their planning application to assess if there is capacity along the existing road network, including the completed sections of the BIRR, to carry the level of development proposed. Where the TIA has indicated that there is not sufficient capacity for all or part of the proposed development, in the event of a grant of permission, holding/phasing conditions have been attached through the development management process. It is therefore considered that the inclusion of such an objective at this time is not required and therefore was not included in the draft LAP.

On completion of the BIRR and through the implementation of Objective BLESS48 of the Draft LAP which supports the development of multiple additional car parking locations that could compensate for any rationalisation of car parking on Blessington Main Street/Town Centre, an opportunity exists to carry out significant enhancement to Blessington Main Street and Market Square outlined under Part B.1 'Town Centre Regeneration' of the draft LAP, where it is an objective to make the area more pedestrian friendly by reducing through traffic flows, reducing the area of the Main Street given over to traffic, vehicles and car parking and instead providing safe pedestrian and cycling facilities, more pleasant spaces to people to dwell and recreate and more opportunities to do business due to a resultant increased footfall. Any future programme of public realm improvement will be subject to the necessary consent process including where necessary public consultation.

With regard to Public Transport, the Local Authority is committed to continuing to deliver all services / infrastructure within its remit to support the provision of improved public transport services in Blessington and

to work with the various transport agencies to progress improvement projects.

While the provision of public transport services is beyond the remit of a land use framework such as a local area plan, objective BLESS49 supports the improvement of public transport services and infrastructure, including the delivery of the BusConnects Programme and Connecting Ireland programme as relevant to Blessington.

Chief Executive's Recommendation

No change to draft Blessington Local Area Plan 2025.

B.6.3 Architectural Heritage

No.	Name	Issues Raised
248	Cllr Jason Mulhall	Architectural Integrity
		Past planning decisions have resulted in inappropriate building structures that detract from Blessington's character. The LAP should incorporate some architectural guidelines to preserve the integrity of the town and ensure that future developments align with its heritage and aesthetic values.

Chief Executive Response

With regard to future development in the ACA of Blessington it is noted that any development in the ACA will be assessed under Chapter 8 of the County Development Plan which refers to Built Heritage. In this regard Objectives CPO 8.10-8.12 refer to the protection and conservation of built heritage in Co. Wicklow while Objectives CPO 8.21-8.24 refer directly to any development proposed in an ACA.

In particular Objective CPO 8.22 requires that "The design of any development in Architectural Conservation Areas, including any changes of use of an existing building, should preserve and / or enhance the character and appearance of the Architectural Conservation Area as a whole".

The development of 'local' heritage protection guidelines would not be appropriate or necessary given the detailed guidance already available and implemented as set out in the 'Architectural Heritage Protection – Guidelines for Planning Authorities' (DoAHG 2011).

Chief Executive's Recommendation

No change to the Draft Blessington Local Area Plan 2025