



Greystones - Delgany & Kilcoole Draft LPF Amendment Stage Submission - Report

Who are you:	Group
Name:	Delgany Tidy Towns
Reference:	GDKLPF-091618
Submission Made	November 21, 2025 9:56 AM

Topic

LAP - Proposed Material Amendments No 4 Submission

Submission

We would like to register our objection to Proposed Material Alteration no 26 to amend zoning of lands at Bellevue Demesne measuring c. 12.5ha from unzoned/outside the LPF boundary to AOS 'Active Open Space' and the addition of a new Specific Local (no. 12) Objective for Bellevue Hill.

Proposed Material Amendment 26:

While wanting to enable the provision of much needed sports facilities we believe that there are lands available locally that are more suited to such a development given the topography of this land as well as its environmentally sensitive location.

The town boundary should not be extended to incorporate this 12.5 hectare site. The site is very close to the Glen of the Downs nature reserve and we are gravely concerned that setting a precedent by the proposed zoning changes on Bellevue Hill could have disastrous consequences in opening up lands for further development in the future.

Zoning this site and allowing development on it will conflict with some of our HERITAGE, BIODIVERSITY & GREEN INFRASTRUCTURE OBJECTIVES:

e.g." To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, European sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi-natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites."

The proposed road access from this site out onto Bellevue Hill also seems to traverse a watercourse, known locally as Brown Trout Stream. Any road construction here would be at variance with the requirement (in our County Development Plan) for a core riparian buffer zone along watercourses to protect biodiversity and water quality.

The road itself is not suitable for heavy traffic and the proposal would lead to considerable traffic up Bellevue Hill, with both access and egress required on a narrow country road.

We are also concerned regarding the equality of access to any proposed sports grounds at this location and require that the sports facilities would remain accessible to families who need to rely on walking or public transport. This is not and will not be possible should this proposed plan go ahead. This would make the grounds accessible only by private car and completely negate any idea of children and adults being able to walk, cycle, and travel by public transport to their sports club.

And finally:

The wording of Specific Local Objective 12:

The text for SLO 12 states "Any development for AOS 'Active Open Space' uses on these lands must include a surfaced walking/running looped trail around the periphery of the lands, which should be open to the public at all times."

This requirement to be open to the public at all times would create a need for extensive lighting which would not be in keeping with the sensitive habitat and would be damaging to bats as well as birds and other forms of wildlife.

We cautiously welcome the statement that "existing hedgerows and wooded areas should be maintained in the development of this area, with minimal breaks to allow access through hedgerows" but as it is rendered null and void by including the phrase "Insofar as is possible", we believe that this is not genuine commitment to preserving the ecologically sensitive areas. Anyone who visits this site will see that the access to Bellevue Hill will only be enabled by cutting right through existing hedgerows and native wooded area.

The subject lands also slope significantly and it is obvious that very extensive earthworks would be required for any sporting pitches to be constructed here. No doubt this would have a negative impact on watercourses etc.

Thank you for considering our group submission.

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