



Draft Blessington LAP Amendment Stage Submission - Report

Who are you:	Agent
Name:	SLR Consulting Ireland Ltd
Reference:	DBLESSLAP-153418
Submission Made	April 23, 2025 4:28 PM

Topic

LAP - Proposed Material Amendments No 7 Submission

Submission

Please refer to submission & drawing attached.

Topic

LAP - Proposed Material Amendments No 20 Submission

Submission

Please refer to submission & drawing attached.

Topic

LAP - Proposed Material Amendments No 30 Submission

Submission

Please refer to submission and drawing attached.

File

250422 - Blessington - Land Use Zoning Concept Plan - R04-.pdf, 3.07MB

25.04.23_BlessingtonLAP_Proposed Amendments FINAL .pdf, 1.01MB

23 April 2025

Proposed Material Amendments - Blessington LAP,
Administrative Officer,
Planning Department,
Wicklow County Council,
County buildings,
Station Road,
Wicklow Town,
Co. Wicklow
A67 FW96

SLR Project No.: 501.065451.00001

RE: Blessington Local Area Plan - Submission to the Proposed Material Amendments to the Draft LAP 2025 on behalf of Belgard Estates Ltd.

SLR Consulting Ireland acts as planning and environmental advisors to Belgard Estates Ltd. of Fortunestown, Tallaght, Dublin 24.

This written submission relates to the Proposed Material Amendments to the Draft Blessington Local Area Plan (hereafter referred to as “Draft LAP”) Consultation, which concludes on the 23rd of April 2025. It follows our attendance at the WCC Draft Blessington LAP consultation event at 16.00 on 21st November 2024 held in the Civic Office, Blessington and subsequent submission on the Draft LAP on 11th December 2024.

1.0 Introduction

Blessington is the largest town on the western side of Wicklow County and is a Self-Sustaining Growth Town, with good transport links and capacity for growth. According to Census 2022, the population of Blessington has increased to 5,611 persons, a 10% increase on the 2011 census.

Belgard Estates Ltd. hold a significant and strategic landbank within the LAP area. This submission relates to the following areas of this landbank (also shown in **Figure 1**):

1. **Lands at Doran's Pit – Processing Area East of Existing N81** : Located within the eastern portion of the LAP area, in the townland of Haylands, accessed by the N81 national secondary road, which connects Blessington to Dublin City Centre to the north (c.27km) and Kilbride Road linking Blessington with the wider hinterland. These lands are included under 'Action Area 4 – Lands at Doran's Pit' and SLO4 in the Draft LAP.
2. **Quarry Lands – East of the Proposed N81** In the north-western portion of the LAP area, lands in the townlands of Santryhill, Newpaddocks, Dillonstown and Deerpark, are accessed by the N81 national secondary road. These lands are currently zoned for 'employment' use and extractive industry.
3. **Quarry Lands – West of the Proposed N81** In the north-western portion of the LAP area. These lands are currently zoned as extractive industry.

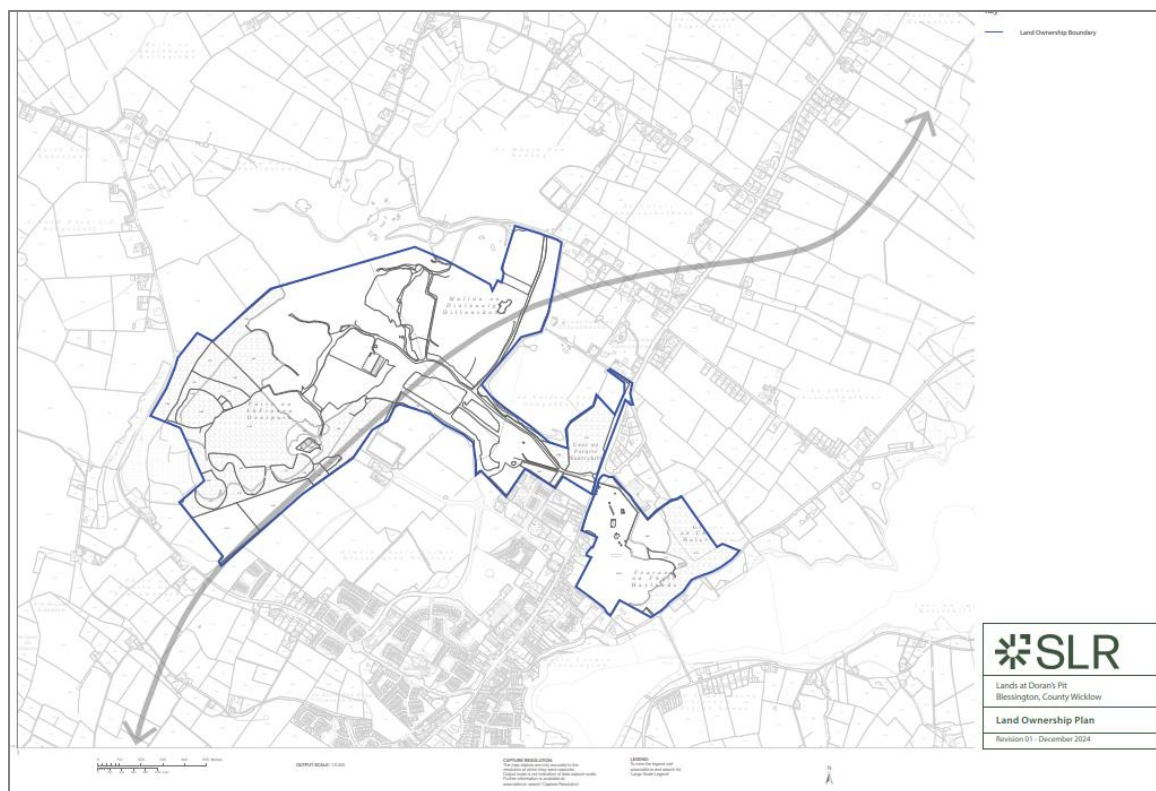


Figure 1: Landownership outlined in Blue



2.0 Basis of this Submission

2.1 Draft Blessington Local Area Plan 2025

Healthy placemaking, climate change and economic opportunity are the three themes of the Wicklow County Development Plan 2022 - 2028 (WCDP), which, as stated in the Draft Blessington Local Area Plan 2025 (Draft LAP), are the *‘strategic objectives that inform and shape this Local Area Plan.’*

The Draft LAP also outlines the relationship with the WCDP in that:

‘the development strategy must be consistent with the ‘Core Strategy’ of the County Development Plan and reflect the history, physical characteristics, strengths, and weaknesses of the area.’

It is further noted, by way of Variation 3 to the WCDP, that the WCDP provides the key parameters for Local Area Plans such as the future population and housing targets and sets out the broad strategy for the future economic and social development of these towns.

Residential Development

Table A in the Core Strategy tables of the WCDP (extract shown in **Figure 2** below) identifies the housing unit requirement for each of the LAP towns, up to the year 2031, and the housing unit capacity of lands zoned in these LAPs, which were in effect at the time of the adoption of the WCDP in 2022.

CORE STRATEGY TABLES

Table A: LAP Towns

This analysis utilises the 2031 housing targets, having regard the likely timeframes of future LAPs (6-10 years), due to be adopted in the 2023 – 2025 period.

SETTLEMENT		POPULATION & HOUSING				ZONING							
Settlement Type	Settlement name	A Census 2016 Population	B Census 2016 (%)	C Housing Target 2016-2031 (less completed units 2017-2020) (units)	D Housing Target (as % of County 2031 target)	E Development capacity of existing zoned lands (units) ⁷	F Development capacity of existing zoned land within built up area (units)	G Development capacity of existing zoned land outside built up area (units)	H Development capacity of existing zoned land within built up area as % of total development capacity (F/E)	I Units required to be provided outside of built up area (units) (C – F)	J Surplus capacity of existing zoned land outside built up area (units) (G – I)	K Surplus land outside of existing built up area (ha)	L Method of addressing shortfall / surplus
County	Wicklow	142,425		11,719	100%								
Key Towns	Bray	29,646	21%	4,897	42%	6,500	2,000	4,500	31%	2,897	1,600	40 ⁸	Will be addressed in next LAP – comprises strategic sites
	Wicklow - Rathnew	14,114	10%	1,742	15%	4,200	2,000	2,200	48%	0	2,200	55 ⁹	21ha already under construction; remaining surplus will be addressed in next LAP
Self Sustaining (Growth) Towns	Arklow	13,226	9%	1,056	9%	5,200	2,100	3,100	40%	0	3,100	78	11ha already under construction; remaining surplus will be addressed in next LAP
	Greystones-Dealgany	18,021	13%	1,078	9%	2,900	1,700	1,200	59%	0	1,200	30 ⁸	7.5ha already under construction; remaining surplus will be addressed in next LAP
	Blessington	5,234	4%	514	4%	1,450	300	1,150	21%	215	935	31 ⁹	Surplus will be addressed in next LAP
	Enniskerry	1,877	1%	91	1%	520	375	145	72%	0	145	5 ⁹	Surplus will be addressed in next LAP
	Kilcoole	4,244	3%	190	2%	600	460	140	77%	0	140	5 ⁹	Surplus will be addressed in next LAP

Figure 2 Extract from the WCDP Core Strategy tables (Table A)

Level 3, Self-Sustaining Growth Towns are defined in the CDP as:

Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.

Level 3, Self-Sustaining Growth Towns are targeted for **growth rates of 25%-30%**, with a population target of 6,145 (population of Blessington is currently 5,611 persons according to Census 2022) and total housing growth 2016-2031 of 519 units by Q2 2028.



Table A of the Core Strategy Tables on page 60 of the WCDP (extract shown in **Figure 2** above) contains analysis of the position in relation to the meeting the 2031 housing targets. Although it concludes that there is a surplus of zoned land of 31ha (based on a density assumption of 30 dwellings per hectare) in the Blessington LAP area and that this surplus will be addressed in the next LAP¹, this position will need to be revised as a result of new housing targets published in November 2024.

Quarries

The Draft LAP notes the growth of a significant sand and gravel extraction industry over the course of the 20th century, focused on the Blessington Delta geological feature in an arc across the northern boundary of the town. The Draft LAP also states that:

Until such time as this area can be appropriately redeveloped, it will present a significant barrier to the northward extension of the settlement.

In parts of this area, quarrying has ceased, and the land has been remediated. This remediation has retained steep slopes, and quarry faces in some circumstances, which may present difficulties in redeveloping the lands.

To the east of the N81, the Draft LAP also refers to a single area of quarrying known as Doran's Pit extends as far as Kilbride Road to the east. Unlike the western quarry area, the Draft LAP recognises that Doran's Pit has a flatter ground level, with the area having been used primarily for ancillary quarry activities rather than active quarrying in recent years. As a result of this, this site is recognised as being more readily available for intensive redevelopment in the shorter term.

Lands at Doran's Pit Processing Area East of Existing N81

The Draft LAP allocates 18 ha for mixed use development and an extended 'natural area' of 15.3 ha. SLO4 is also included in the Draft LAP which refers to specific requirements in relation to these lands.

Under the Draft LAP, the subject lands at Doran's Pit make up a portion of a 'Specific Local Objective' designation, which is intended to guide developers on land use, infrastructure and phasing requirements. A range of community, sporting, tourism facilities and infrastructure are to be provided under SLO4. In the Draft LAP, this infrastructure included:

- A road linking the N81 to Kilbride Road/Knockieran Bridge
- A pedestrian/cyclist only street
- A multi-purpose community building fronting onto the central park/plaza.
- A childcare facility of a sufficient size fronting onto the central park/plaza.
- c.3.3 ha of active open space / sport uses
- not less than c.2.7 ha for the possible future development of an amenity car park and other tourism infrastructure.

¹ As of November 2024, agreed revisions to the housing targets for the period 2025 to 2030 will aim to deliver a total of 303,000 new homes across Ireland and will result in a revision to WCDP targets with an increased housing requirement at the local level.



Quarry Lands – East of the Proposed N81

The Draft LAP zones 15.2 hectares as employment, allocating the balance of 6.8 ha as ‘natural area’ zoning. SLO3 is also included in the Draft LAP which refers to specific requirements in relation to these lands.

Quarry Lands – West of the Proposed N81

Under the Draft LAP, the lands to the west of the N81 were zoned as ‘extractive industry’ and ‘natural areas’.

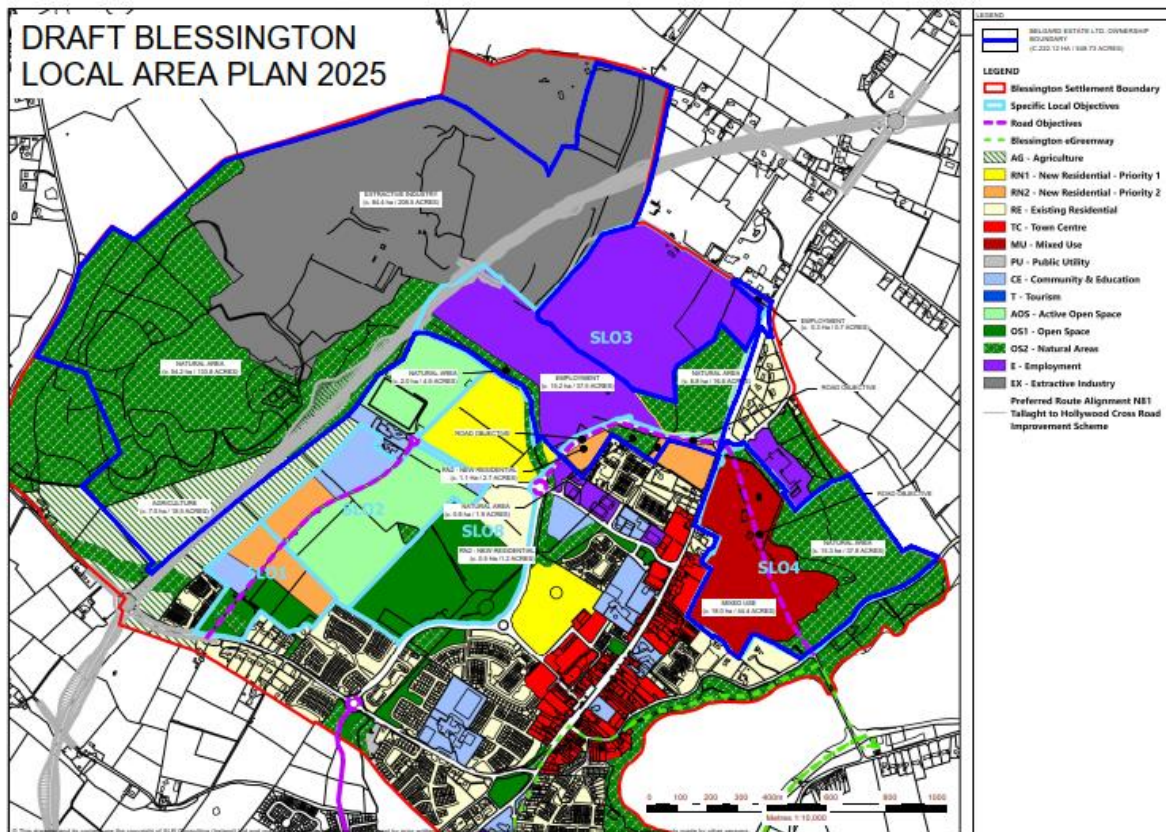


Figure 3: Draft LAP Zoning Map (landownership in blue)



3.0 Submission on Amendments to the Draft LAP

This submission is made with respect to the Amendments to the Draft LAP and includes reference to the revised population targets as provided by the updated National Planning Framework. Changes are requested to

- Facilitate revised population targets as provided by the updated National Planning Framework
- Proposed Amendment no. 20 - Lands at Doran's Pit Processing Area East of Existing N81 (SLO4)
- Proposed Amendment no. 30 - Quarry Lands – West of the Proposed N81

3.1 Changing Policy Context and Updated Housing Targets

3.1.1 Updated National Planning Framework

The revised NPF makes housing a critical priority up to 2040, with a target of 50,000 new homes per annum, more than double previous targets. Local authorities will now have to review their plans and policies to align with the revised NPF. This is expected to lead to significantly more land being zoned for housing development.

It is envisaged that the updated framework will be accommodated by way of a further variation to the Wicklow County Development Plan 2022 – 2028 and Blessington Local Area Plan 2025.

As a result of changes now required as a result of the NPF, a change in the Employment zoning to Residential and Active Open Space, as shown on the SLR Concept Plan (Figure 7 - Area 1) is requested. This would have the benefit of creating additional land for residential purposes together with an ancillary area of Active Open Space and facilities which would be complementary to the existing Sporting / Recreational Hub.

Whilst acknowledging that this residential area would form part of 'RN2 – New Residential Priority 2, this proposed residential zoned area (Figure 7 - Area 1) is justified on the basis of site suitability and compatibility with other nearby residential areas, and forms part of a wider integrated housing / community facility / open space scheme that will be well connected to the existing built up area. The site will provide additional residential capacity in light of the NPF changes and increased housing targets.

Area 1 would also provide a further 3.98 ha of active open space in close proximity to this residential area, balancing the requested reduction to the area located in SLO4. This approach would avoid the inappropriate location proposed by Material Amendment no. 30 and also ensure that the delivery of significant additional active open space for Blessington is not dependant on the development of a singular opportunity site i.e. SLO 4.

Requested Amendment 1: Additional RN2 – New Residential Priority 2 and Active Open Space Zoning

3.1.2 Proposed Amendment no. 20 - Lands at Doran's Pit Processing Area East of Existing N81 (SLO4)

In the submission on the Draft LAP, our client requested reduced Quantum of Active Open Space / Tourism Requirement on the basis that there was insufficient justification provided in the Draft LAP in relation to the quantum of active open space and amenity car park/ tourism infrastructure required at this location.

The Draft LAP stated that the provision of 3.3 ha of active open space and the reservation of land of not less than c.2.7 ha for the possible future development of an amenity car park and



other tourism infrastructure is required. In total 6 ha of land was allocated for these uses in the Draft LAP, however no rationale for this amount of space at this location was provided.

While it is acknowledged that an area of active open space will be provided as part of SLO4, our client sought a reduction in the quantum of active open space to 2ha given that this is considered more than sufficient to meet the requirement for this area.

The provision of a smaller area of active open space at SLO4 (indicatively shown as Area 2 in **Figure 7**) will also facilitate the development that is in keeping with the development of a compact urban extension.

It was also suggested that an additional area of active open space could also be provided at this location (See Area 2, **Figure 7**) which could provide a total area of 3.98 ha of active open space in close proximity to other proposed residential areas. This would balance the requested reduction to the area located in SLO4 and result in a net increase of 2.68 ha (3.98 ha -1.3ha) in the current provision in the Draft LAP.

In the Proposed Material Amendments, the text of SLO4 was amended resulting in an increase in active open space requirement in the mixed-use area from **c. 3.3 ha to c. 5 ha** and a decrease in amenity car park/ tourism infrastructure from **c. 2.7 ha to c. 1 ha**.

Again, no rationale for this increase in active open space has been identified <https://www.wicklow.ie/Portals/0/adam/Documents/kkDEtKoLGknicFBS-2vqA/Link/Blessington%20LAP%202025%20Proposed%20Material%20Amendments.pdf> and indeed the revised amount of 5ha is contrary to the findings of the Social Infrastructure Audit conducted with respect to the LAP. This Social Infrastructure Audit, which provides the evidence base and rational for zoning provisions for Social Infrastructure in the LAP, identifies 3.3ha of Active Open Space at SLO 4. See page 70 of the audit and extract in **Figure 4** below².

Lands Zoned for Community & Education Use		
Location	Zoning	Area (ha)
Blessington Business Park/Oak Drive	CE	1.4
SLO2 (Blessington Demesne adjacent to KARE)	CE	3.6
SLO1 (Blessington Demesne Link Road)	CE	1.3
Total	CE	6.3

Zoned for Open Space ⁴		
Location	Zoning	Area (ha)
New Town Park	OS1	15.3
N81/Naas Road Junction	OS1	1
Blessington Business Park	OS1	0.2
South of Naas Road (southern BIRR)	OS1	0.4
SLO 1 (Naas Road/Blessington Demesne Link Road)	OS1	3.9
SLO2 Blessington Demesne	AOS	14.9
SLO4 (Doran's Pit)	MU/AOS (see SLO4)	3.3
Total	OS1/AOS/MU	39.0

Figure 4 Zoning provisions for Social Infrastructure (Social Infrastructure Audit)

The concept map for SLO4 has also been amended (See **Figure 5**). The tourism facility's orientation has been changed, as well as a smaller area for its car park. An additional area of 'Potential Active Open Space' area has been added to the Concept Plan. Without an identified end-user for both the sports and tourism facility this requirement renders the development of SLO 4 unviable and undeliverable. It is requested that these elements of the concept plan be removed.

Requested Amendment 2: Removal of sports and tourism facility from Concept Plan for SLO 4 and reverse the increase in active open space requirement in the

² [3. Blessington Social Infrastructure Audit.pdf](#)



mixed-use area from c. 5 ha to c. 2 ha as previously requested. The remaining active open space requirement of 1.3ha can be met by Proposed Amendment 1.





Figure 5 Proposed Amendment to SLO 4 Concept Plan (extract from the Draft LAP).



3.1.3 Proposed Amendment no. 30 - Quarry Lands – West of the Proposed N81

New zoning for 'Active Open Space' has also replaced a sizeable portion of the previously zoned 'Extractive Industry' area with a change of c. 6.9ha at Deerpark from 'EX – Extractive Industry' to 'AOS – Active Open Space' (See item 30 in Figure 6). As with Proposed Material Amendment no. 20 no reasoned justification for this amendment has been provided in the Proposed Amendments to the Draft LAP. This change has been made without adequate reasons and is contrary to Page 244 of the Chief Executives Report Under the Chief Executive Response, it is stated that.

The CE is satisfied, on the basis of the detailed analysis conducted in the Social Infrastructure Audit, that the draft plan makes appropriate provision of land zoned for future sports development in the plan area (land zoned AOS).

In relation to the suggested greater than anticipated population growth, the Social Infrastructure Audit has accounted for both the existing population as per the 2022 Census, the planned population growth as per the Wicklow County Development Plan and the population in Blessington within Co. Kildare and the targeted population as per the Kildare County Development Plan 2023-2029. The CE is satisfied that the recommended area of Active Open Space as set out in the Blessington Social Infrastructure Audit accounts for the planned growth as per the prevailing Core Strategies as relevant to Blessington.

The CE is satisfied that the areas identified, based on sound planning principles, for new AOS in the draft plan are the most suitable to serve the needs of the settlement and its wider catchment, in terms of proximity to the built up parts of the town, existing and planned residential areas, as well as being most accessible to active travel infrastructure and public transport routes. ***The main areas identified for future AOS use are located in very close proximity to the existing GAA grounds and are better located than the lands suggested in the submission, which are peripheral.***

In relation to the request for playing fields to be included as permitted in principle under the AG 'Agriculture' zoning, the CE would have no issue with such a use being included as 'permitted in principle' but this would appear to be an unnecessary recommendation given that the request to zone additional lands in this submission for AG is not supported.

The Chief executive recommendation is subsequently stated as *no change to the Draft Blessington Local Area Plan 2025-2031*. It is therefore requested that this zoning be removed.

The allocation of approximately 6.9 hectares of Active Open Space at Deerpark contradicts the conclusions of the Social Infrastructure Audit, which serves as the foundational evidence for zoning regulations concerning Social Infrastructure in the Draft Local Area Plan. This proposed area exceeds the requirements outlined in the Social Infrastructure Audit. From the perspective of sound planning and sustainable development, this site is entirely inaccessible from the town centre, leading to hazardous traffic conditions should the Blessington Inner Relief Road be constructed. Additionally, a comprehensive justification for zoning within a development plan is necessary to align with legal precedents, particularly the case of *Sister Mary Christian and Others v Dublin City Council*, which mandates that councils provide sufficient rationale for their zoning decisions. This submission therefore requests the reversal of the amendment that has resulted in a change of c. 6.9ha at Deerpark from 'EX – Extractive Industry' to 'AOS – Active Open Space'.



Requested Amendment 3: the reversal of the amendment that has resulted in a change of c. 6.9ha at Deerpark from 'EX – Extractive Industry' to 'AOS – Active Open Space.'

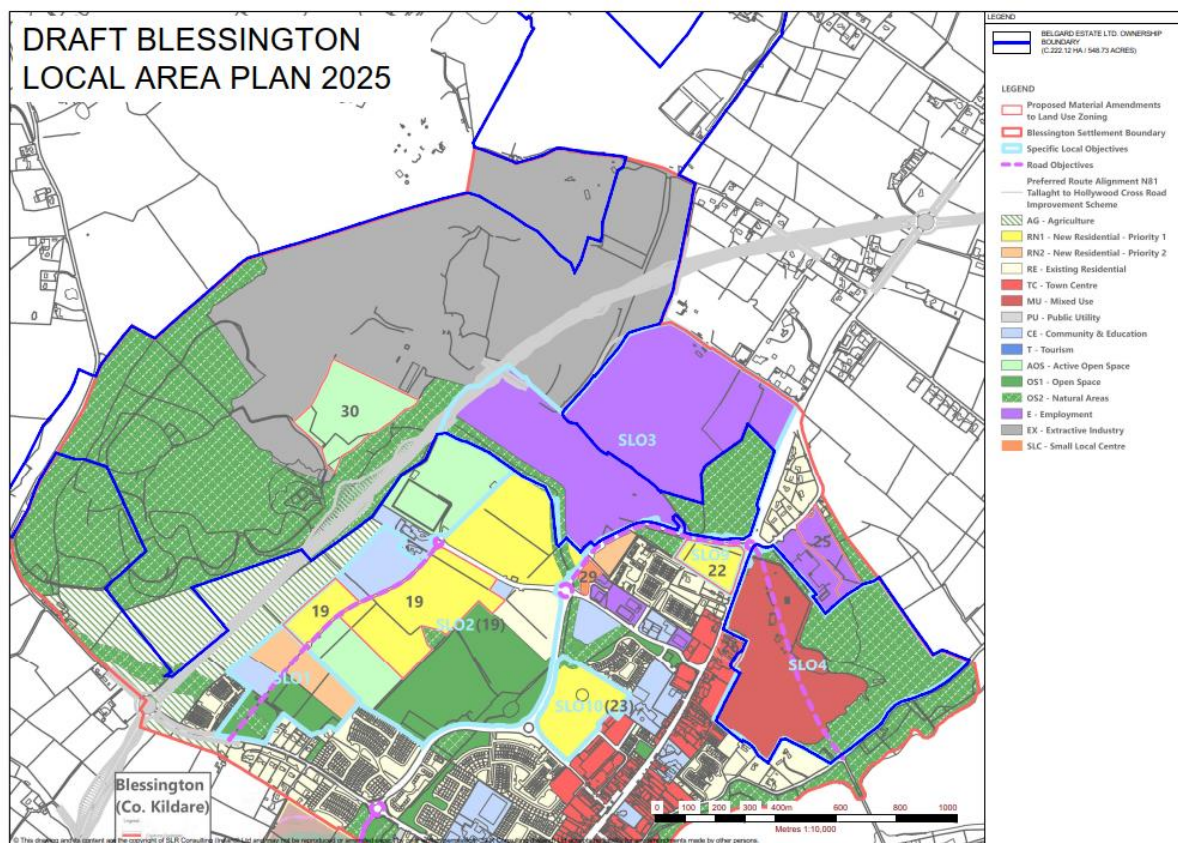


Figure 6 Blessington Land Use Zoning Map - Proposed Material Amendments





Figure 7 SLR Land Use Zoning Concept Plan (Proposed Amendments 1,2 and 3)



3.2 Summary of Submission on Proposed Amendments to the Draft LAP

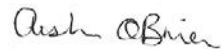
A summary of the requested amendments to the Proposed Material Amendment to the Draft Blessington LAP is provided below (please refer also to Figure 7/ Land Use Concept Plan enclosed).

1. Proposed Amendment 1: Additional RN2 – New Residential Priority 2 and Active Open Space Zoning to facilitate revised population projections set out in the Updated NPF.
2. Proposed Amendment 2: Removal of sports and tourism facility from Concept Plan for SLO 4 and reverse the increase in active open space requirement in the mixed-use area from c. 5 ha back to c. 3.3 ha.
3. Proposed Amendment 3: Reversal of the amendment that has resulted in a change of c. 6.9ha at Deerpark from 'EX – Extractive Industry' to 'AOS – Active Open Space'.

Belgard Estates Ltd welcome Wicklow County Council's consideration of these requested changes in due course. In the meantime, should you have any queries on the above submission, or wish to discuss any matter further, please do not hesitate to contact the undersigned.

Yours faithfully

SLR Consulting Ireland



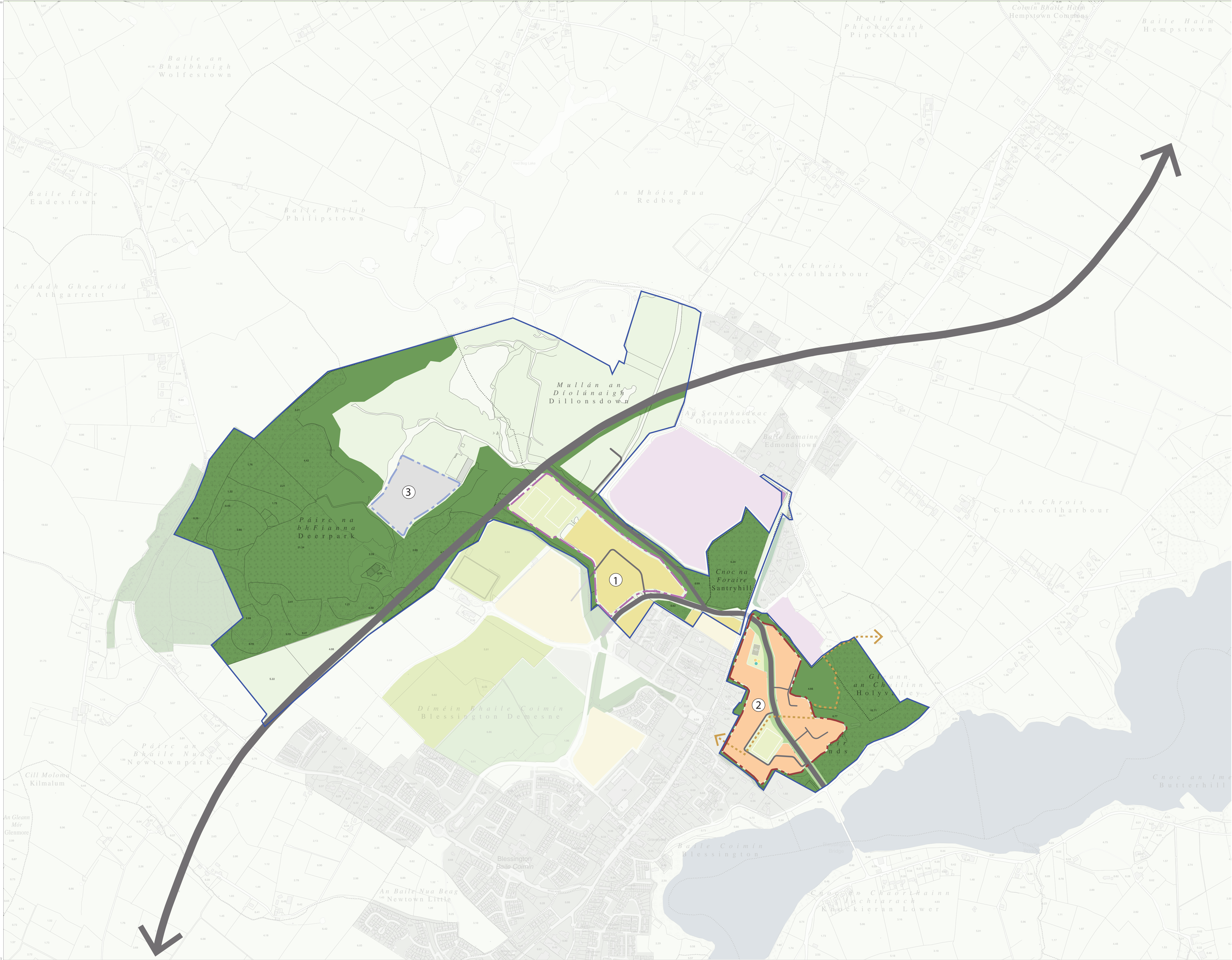
Aislinn O'Brien

Technical Director - Planning

Cc. Mr. R. Griffin (Belgard Estates Ltd.)

Enclosure: Land Use Concept Plan





- Key
- Land Ownership Boundary
 - Employment
 - Residential
 - Mixed Use
 - Public Open Space
 - Active Open Space
 - Natural Areas
 - Strategic Land Reserves
 - Pedestrian & Cycling Route
 - Indicative Vehicular Routes

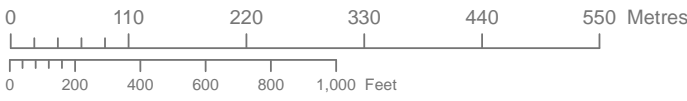
- Request Amendments:
- Request Amendment 1
 - Request Amendment 2
 - Request Amendment 3



Lands at Doran's Pit
Blessington, County Wicklow

Land Use Zoning Concept Plan

Revision 04 - April 2024



OUTPUT SCALE: 1:5,000

CAPTURE RESOLUTION:
The map objects are only accurate to the resolution at which they were captured. Output scale is not indicative of data capture scale. Further information is available at: www.taitte.ie; search 'Capture Resolution'

LEGEND:
To view the legend visit www.taitte.ie and search for 'Large Scale Legend'

