



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

Who are you:	Private Individual
Name:	Conor Donelan
Reference:	GDKLPF-164245
Submission Made	November 21, 2025 4:45 PM

## Topic

LAP - Proposed Material Amendments No 26 Submission  
Submission

My name is Conor Donelan, I am writing on behalf of myself and my mother Margaret Donelan who lives on the land adjacent to the area in question.

Mum has a right of easement to a water source directly fed from these lands and is gravely concerned about the impact of the clubs use of glyphosate on the pitches on our water supply.

We would also like to strongly object to this rezoning due to the reasons below and would like to point out that this Summer past, Marsh Fritillary butterflies were reported in the area. These are a protected species.

## 1. INTRODUCTION

I wish to submit the following formal observation on Proposed Material Alteration No. 26, which proposes the rezoning of approximately 12.5 hectares of land at Bellevue, Delgany, from "Unzoned/Outside the LPP

Boundary" to Active Open Space (AOS) along with the introduction of a new Specific Local Objective (SLO 12).

Bellevue consists of gently sloped lands, immediately adjoining a 12,000-year-old glacial valley, forming one of the most environmentally, culturally, archaeologically and ecologically sensitive landscapes in North Wicklow. Its importance rests not only in its biodiversity but also in its deep cultural history, its hydrological function, its role as a wildlife corridor linking Glen of the Downs SAC with Delgany, and its position in a rare surviving historic landscape.

### Our Family's Relationship With This Land

Our family has lived beside, worked with, and cared for this landscape for generations. Before it was sold by my uncle about 30 years ago.

I understand this land intimately not from a distance.

My connection to this land is not passive. Having helped to farm it with my uncle when I was younger.

## 2. ECOLOGICAL SIGNIFICANCE OF BELLEVUE

Bellevue forms a critical ecological corridor linking:

- Glen of the Downs SAC (Natura 2000 site)
- Downs Hill and Coolagad Hillfort woodlands
- Delgany Heritage Village
- ancient hedgerow networks
- semi-natural grasslands
- the glacial valley ecosystem
- the Three Trout Stream

This connectivity allows species to move safely between high-value habitats. It is one of the last remaining intact corridors in North Wicklow, and its protection is essential for biodiversity conservation.

### Bird Species Present

Bellevue supports a diverse and significant bird population, including:

- Red Kite – flagship Wicklow species, sensitive to disturbance
- Great Spotted Woodpecker – established breeding species
- Barn Owl (Red-list protected) – relies on darkness and silent hunting corridors
- Long-Eared Owl – highly sensitive to disturbance
- Buzzard – hunts over open fields
- Sparrowhawk
- Mistle Thrush
- Greenfinch, Robin, Starling, Swallow

These species depend on:

- dark sky conditions
- unbroken hedgerow networks
- quiet evening environments
- insect availability
- mature woodland edges

AOS zoning and sports activity would destroy these conditions.

### Mammal Species Present

The corridor supports:

- Red Squirrel – reliant on unfragmented woodland
- Pine Marten – indicator of a healthy ecosystem

- Irish Stoat
- Badger
- Hedgehog – declining nationally
- Irish Mountain Hare – sensitive to noise disturbance
- Red Deer (occasional movements)
- Old Irish Goat (endangered native landrace)

These species require:

- safe nighttime movement
- undisturbed feeding routes
- low-noise environments
- the absence of heavy lighting

#### Bat Species (Strict EU Protection)

Species recorded within the Bellevue corridor include:

- Leisler's Bat
- Common Pipistrelle
- Soprano Pipistrelle
- Brown Long-Eared Bat
- Whiskered Bat

All bat species are protected under the EU Habitats Directive.  
Artificial lighting directly interferes with their survival.

#### Amphibians & Invertebrates

Bellevue's wet depressions and seepage areas support:

- Common frog
- Marsh Fritillary
- Smooth newt
  - dragonflies and damselflies
  - extensive moth and butterfly populations
  - native pollinators

These species collapse under increased disturbance, lighting, or hydrological changes.

Conclusion: Bellevue is an irreplaceable ecological asset whose function cannot be replicated elsewhere.

### 3. FLOODLIGHTING IMPACTS ON WILDLIFE

Floodlighting is one of the most ecologically destructive forms of development possible on this land.

#### Impact on Bats

Scientific studies show:

Artificial light at night reduces bat activity by 50–90%, even at low intensity.

Floodlights:

- block commuting corridors
- reduce feeding by eliminating insect concentrations
- interfere with navigation
- cause permanent displacement
- fragment the corridor linking Delgany and Glen of the Downs SAC

## Impact on Owls

Owls rely on:

- darkness
- silent corridors
- stable prey populations

Floodlighting:

- disorients owls
- reduces hunting efficiency up to 70%
- increases chick mortality
- permanently displaces breeding pairs

## Impact on Red Kites & Raptors

Raptors avoid:

- bright lights
- high activity
- unpredictable human presence

The loss of their feeding grounds would be severe and irreversible.

## Impact on Insects

Floodlights kill thousands of insects per night, leading to:

- collapse in food availability for birds, bats, and amphibians
- disruption of seasonal breeding cycles
- significant decline in pollinator numbers

## Impact on Glen of the Downs SAC

Skyglow from even “fully shielded” floodlights travels long distances.

The SAC is especially sensitive to:

- disturbance
- nocturnal disruption
- fragmentation of feeding grounds

Floodlighting Bellevue would violate EU conservation obligations.

## 4. NOISE & DISTURBANCE EFFECTS

Sports activity generates:

- shouting
- whistles
- ball impacts
- fast directional movements
- evening traffic
- late-night departures

These disturbances:

- disrupt Pine Marten foraging patterns
- displace Red Squirrels
- interrupt hare feeding cycles
- prevent owls from hunting

- interfere with fox and badger movements
- cause widespread displacement of bats

Natural evening quietness is essential for wildlife and would be permanently lost.

## 5. HYDROLOGY & WATER RISKS

Bellevue's gently sloped lands contain:

- natural springs
- hydrological depressions
- seepage slopes
- seasonal wetland features
- runoff feeding the glacial valley
- hydrological connection to the Three Trout Stream

Sports development requires:

- earthworks
- levelling
- engineered drainage
- soil compaction
- installation of impermeable surfaces

This risks:

- sediment entering the Three Trout Stream
- contamination of amphibian habitats
- altered groundwater behaviour affecting the SAC
- erosion of the slope
- pollution runoff
- flooding risks downslope

Hydrological disruption here has far-reaching consequences.

## 6. ARCHAEOLOGICAL & HISTORICAL SIGNIFICANCE

Bellevue lies within one of the richest historical landscapes in Ireland.

Downs Hill & Coolagad Hillfort

These sites form part of a major Bronze Age ritual complex, with:

- ceremonial enclosures
- ancient routeways
- archaeological layers of national significance

Bellevue forms the transitional land between these ritual landscapes and Delgany.

The Kingdom of Cuala

This land formed part of the early medieval Gaelic kingdom of Cuala, centred on the Sugarloaf. The cultural memory of this landscape carries through folklore, placenames and archaeological continuity.

Viking Hinterlands – Dyflinarskiri

Bellevue sits in the hinterlands that supported Viking Dublin. Its lands formed part of the broader Norse–Gaelic interaction zone.

La Touche Heritage

The La Touche family shaped the appearance and heritage character of:

- Delgany Village
- local woodland planting
- rural estate landscapes
- traditional field boundaries

Bellevue forms part of this historic cultural setting.

Heritage landscapes once fragmented are lost forever.

## 7. LANDSCAPE CHARACTER & RURAL SETTING

Bellevue provides:

- the rural buffer protecting Delgany
- the visual link to Downs Hill
- the natural dark-sky backdrop
- the open setting of the glacial valley
- continuity of traditional field patterns
- the woodland edge that connects to the SAC

AOS zoning introduces:

- lighting
- heavy engineering
- urbanisation
- traffic
- noise
- built infrastructure

These changes fundamentally undermine the landscape character.

## 8. EU LAW OVERRIDES IRISH PLANNING LAW

Local authorities must comply with EU environmental law, which supersedes national planning decisions.

Relevant EU laws:

- Habitats Directive
- Birds Directive
- Water Framework Directive
- EIA Directive
- SEA Directive
- Aarhus Convention
- EU Nature Restoration Law (2024)

EU Nature Restoration Law Requires:

- protection of ecological corridors
- avoidance of new habitat deterioration
- restoration of wetland and semi-natural habitats
- safeguarding areas adjoining Natura 2000 sites
- prevention of increased disturbance

Rezoning Bellevue contradicts these legal obligations and risks EU infringement proceedings.

## 9. ISSUES WITH SPECIFIC LOCAL OBJECTIVE 12

SLO 12 requires:

“a surfaced walking/running looped trail open to the public at all times.”

This necessitates:

- lighting
- hard surfacing
- breaks in hedgerows
- increased human presence
- evening activity
- habitat fragmentation

It is incompatible with:

- bat protection
- owl conservation
- SAC adjacency
- equine welfare
- heritage protection
- landscape character

SLO 12 is unworkable and damaging.

## 10. CONCLUSION

Rezoning Bellevue under Proposed Material Alteration No. 26 would:

- damage biodiversity
- fragment ecological corridors
- harm protected species
- place wildlife under severe stress
- compromise hydrology feeding the SAC

Increase traffic on the already oversubscribed Bellevue Hill road. A road whose surface is falling apart under the weight of construction traffic and increased use from people trying to avoid the Glen of the Downs Bottleneck. This is even before the Bellevue development closer to the village is inhabited.

Sincerely

Conor & Margaret Donelan

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**File**

Conor Donelan Objection .docx, 0.12MB



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Our family has lived beside, worked with, and cared for this landscape for generations. Before it was sold by my uncle about 30 years ago.

I understand this land intimately not from a distance, but through continuous lived experience. I know its wildlife movements, the seasonal flow of water across its gently sloped fields, the precise location of springs and seepage lines, and the ways in which the land interacts with the adjoining glacial valley and the Three Trout Stream.

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