

# Draft Blessington LAP Amendment Stage Submission - Report

Who are you:	Group
Name:	Blessington District Forum
Reference:	DBLESSLAP-224343
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## Topic

LAP - Proposed Material Amendments No 19 Submission

#### **Submission**

The below submission is regarding various material amendments for the Blessington LAP.

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# File

BDF - Blessington LAP - Materials Amendments Submission.pdf, 1.95MB



# **Blessington District Forum**

# **Proposed Material Amendments**





# 1) Foreword

Blessington & District Forum is a community-based voluntary body.

The Forum is a 32-member body representing Blessington & the surrounding area and facilitates all matters in relation to community and societal development, planning, town development, and environmental issues in cooperation with Wicklow County Council and other Statutory Bodies. Established in 2001, Blessington & District Forum is the united community body for the area.

# 2) Introduction

The Blessington District Forum would like to thank the Wicklow County Council planners on their hard work so far on the LAP for the town of Blessington. We are very pleased to see some of the BDF's recommendations being utilised such as the pedestrianisation of the market square, the natural linkages throughout the town and the zoning of Active Open Space lands and their development proceeding residential development. This being said we feel that there is further work to be completed and would appeal to the planners to maintain their efforts and make the below recommendations.

The previous 2013-2019 draft LAP was unchanged and adopted as the 2013-2019 LAP. This we feel should not be the case in the upcoming LAP, if submissions can be made at draft stage, then these submissions should be taking into account as there is always ways to improve the LAP which will be adopted.

# 3) Agreement - Proposed Material Amendments

The Forum would be in agreement with the majority of the Proposed Material Amendments and have noted some of these agreements below.

The Forum is in full agreement with the planners change in zoning as per the below zoning map and written detail at Blessington Demesne. The Forum is in agreement so long as the written detail remains the same and the facilities remain as noted as there has been a reduction from 15 hectares of AOS lands to 4.5 hectares in this area. This reduction has obviously been agreed by the council



and Cairn Homes the landowners so should remain as such for this LAP and future LAP's as Cairn have gained a significantly amount of residential land.

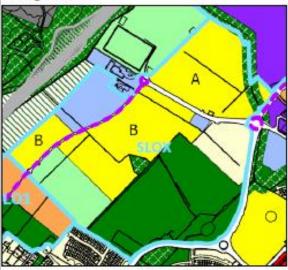
One note for the sports facilities would be that an internal Basketball court be completed in these

lands and not an external court. There are numerous external basketball courts within the new Blessington Community College planning permission. There will be more than enough external courts for the community of Blessington so the need for an internal is much greater than further external courts.

# Change from:



## Change to:



This SLO is located in the townland of Blessington Demesne. This SLO measures c. 51ha and comprises

- c. 4.5ha zoned for AOS 'Active Open Space',
- c. 15.3 ha zoned OS1 'Open Space',
- c. 1.4 ha zoned for OS2 'Natural Areas';
- c. 3.8 ha zoned CE 'Community & Education',
- c. 21.8ha zoned RN1 'New Residential Priority 1' and
- c. 3.3 ha zoned RE 'Existing Residential'.

The RN1 zones are located in two parcels – A and B (A being the parcel to the north of Oak

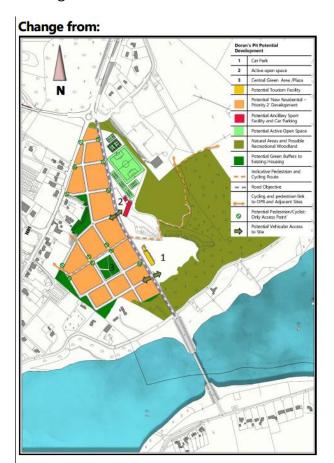
Drive and B comprising two RN1 sites to the south of Oak Drive/west of the new park).

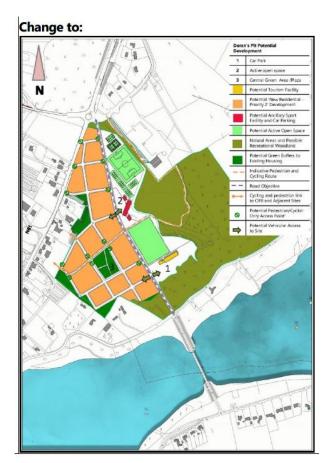
Any development proposals for this SLO shall comply with the County Development Plan, this Local Area Plan and the following requirements:

- No dwelling units that may be permitted on foot of the RN1 (Parcel A) zoning may be
  occupied until the new town park, which shall include a dog park, located on lands
  zoned OS1, is completed in full. The development of the town park should have regard
  to and integrate demesne features and other heritage elements associated with the
  former Blessington Demesne, and should include appropriate buffer zones/mitigating
  measures in relation to habitats of biodiversity value (including areas identified as
  Local Biodiversity Areas).
- Any new residential development proposals for the RN1 (Parcel B) lands shall be accompanied by proposals for the concurrent development of community sports facility on lands zoned AOS measuring not less than 4.5ha, of a design and layout and including such facilities and support buildings to be agreed with the Planning Authority but which shall include at a minimum a full size polyurethane 400m 8-lane running track, with field athletics space within, a separate full size (i.e. 90mx145m) multi sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch
- Car parking to serve the AOS lands should also be of a sufficient size, layout, and location
  to serve as an alternative car park for access to Glen Ding via the (under construction)
  green link that passes through the SLO from the town park. The scale of this car parking
  should not exceed that necessary to serve the AOS lands and alternative access to Glen
  Ding (noting the limited existing provision of parking spaces at the entrance to Glen Ding),
  and should not detract from the efficient use of the AOS lands for the primary purpose of
  active open space/sports/recreation uses.
- No dwelling units that may be permitted on foot of the RN1 (Parcel B) zoning may be
  occupied until this community sports facility is fully developed suitable for community
  sports use (including necessary buildings/structures, layout, drainage, surfacing,
  lighting, access and car parking) and is available for community use;
- This community sports facility shall be suitable for the needs of, and shared use by, potential future educational uses on the site reserved for such within this SLO.
- CE zoned lands (excluding the under construction childcare facility) measuring not less than 3.56ha shall be serviced as part of the development of the SLO and reserved for future education use.
- The development of structures along all existing and proposed arterial and link roads should provide a strong sense of enclosure as per Section 4.2.1 of the Design Manual for Urban Roads and Streets, subject to the adequate protection of visual/landscape amenity from Blessington Main Street/Blessington Inner Relief Road to Glen Ding



The Forum is also in agreement with the updated amendments of Doran's pits lands. There is substantial potential here the forum feels for sporting facilities, a tourist area and a community building as well as the much needed residential units.





- The MU zone shall be developedment as follows:
  - (a) Predominantly residential development, as per the RN2 zoning objective, shall be provided to the south/southwest of the road objective through this SLO, pending the agreement of the exact route of this road objective and in any event shall not exceed 12 ha in total area. This predominantly residential area should be laid out as urban streets and squares with a well-enclosed central park/plaza focal point and appropriate buffers to existing adjacent residential areas. Only 50% of the predominantly residential area may be developed without the complete provision of the above active travel link to Blessington Main Street via OP8.
  - (b) The following additional infrastructure shall be provided within the predominantly residential area
    - 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) The development of at least <a href="#">c.3.3 ha</a> c. 5ha</a> of active open space / sport uses and ancillary facilities on the north-eastern side of the road objective in the vicinity of the N81. The exact type and layout of active open space uses shall be agreed with the Planning Authority. Permission for residential development within this SLO will not be considered unless this sport ground

will be completed and available for use upon the occupation of the 1st house.
(d) The reservation of land of not less than c..2.7 ha c. Tha or the possible future development of an amenity car park and other tourism infrastructure. The location of this reserved land shall allow for easy access to both the above wooded area and the Blessington Lakes (via the road objective), while minimising the interaction between parking cars and cyclists/pedestrians.



The Forum would also be an agreement with the SLO 6 as per the adjacent image and the written detail with an area to be utilised for Community, Tourism accommodation & Sport.

# Specific Local Objective 6 – Burgage More (Central)

Figure B.8.8: Specific Local Objective 6

This SLO is located in the townland of Burgage More and is in Local Authority ownership. The SLO measures c. 9.4 ha and comprises c. 5.8ha 5.0ha ha zoned MU 'Mixed Use', c. 0.8ha zoned CE 'Community & Education' and c.3.6 ha zoned RN1 'New Residential Priority 1'. Consent is already in place for the development of the RN1 lands for residential purposes. The boundary with the OS2 zone is generally defined by the 194m contour. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- Lands zoned CE shall be reserved for cemetery and associated car parking development;
- Lands zoned MU may be developed for a range of uses, including (but not limited) to tourism (including tourism accommodation), sport, community (including cemeteries), employment and residential use, subject to the following criteria:
  - Lands to the west of the north-south hedgerow / tree line:
  - a) The development of a link street through the SLO leading from an agreed future potential crossing point from SLO5. This link street should continue south and west through the SLO to join to the junction at Burgage Castle estate/Burgage Cemetery.
  - Development in this SLO shall provide vehicular access from this link street into SLO 7 to the south.
  - c) The development of an active travel link from the potential crossing point from SLO 5 to meet the existing Blessington Greenway to the south of the Avon resort. Such a link should not include the levelling or draining of the low lying area zoned OS2 'Natural Areas'.



# 4) Further Proposals - Proposed Material Amendments

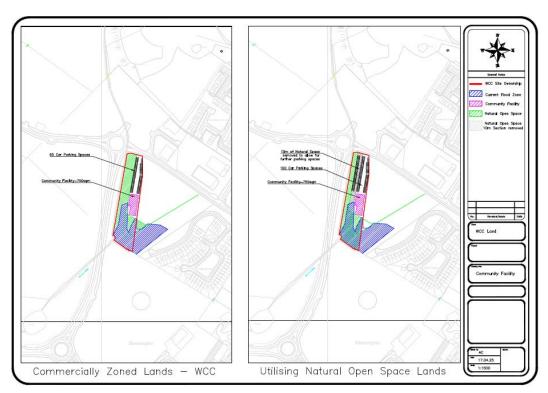
The Forum would be in agreement with the majority of the Proposed Material Amendments but feel there are a few proposals that should be undertaken to improve the plan. These proposals we feel are necessary actions to ensure the prosperity and growth of the town, its voluntary groups and the many local clubs.

# **Proposal 1 – Community Facilities**

There has been a community facility earmarked for the lands to the north east of Dunnes & Doran's Pit lands. With Glenveagh/Marshalling yards already granted planning for their development it will be very difficult to enforce a community building within this location. Further to this the lands at Doran's pit have been idle for the last 15 years and could remain idle again for a similar length of time so the Forum feels that other areas should be allocated for community facilities within the town.

Below the Forum has highlighted areas of lands that could be utilised for a community facility within the town of Blessington. A SLO should be implemented for the lands below to ensure the future development of these lands for a community facility

# WCC Lands - Santryhill (West of Oak Drive)

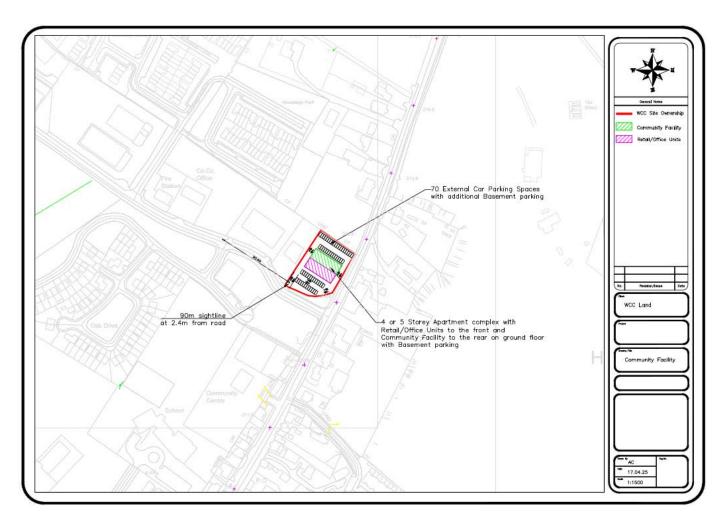




The lands to the west of Oak drive as above which are owned by Wicklow County Council could be used for a community facility. Being currently owned by the council could allow for a quick solution for the on going need for a community facility.

# WCC Lands - Santryhill (North of Aldi)

Another location for a community facility could be the lands to the north of the current Aldi shopping centre. This is a prime location for a block of apartments 4 or 5 storeys high with retail units and a community facility on the ground floor.



Parking could be positioned surrounding the building while a basement construction could allow further parking for the apartment units. Sightlines to the right of these lands on exit are sufficient with over 90m. This would suit a system of no right turn when exiting with the junction to the N81 showing minimal sightlines.



# **Clonmel Lands (South West of Dunnes)**

Another area where a community building could be allocated is the Clonmel Enterprises lands to the south west of Dunnes Stores. They are currently looking for planning permission and have been asked for further information requests from the council. It is noted that the RFI requests information on a concern on the number of mixed-use proposed in this development. A community facility should be made available within this planning permission and if cannot be enforced at this stage a further RFI should request a community facility or should be made as a condition of the planning being received.

Planning and Development Regulations 2001(as amended) – Planning Register Reference 25/60074 - Clonmel Enterprises Ltd. - a proposed development comprising 71 No. residential units and a retail/commercial space of approx. 96sq.m on a site of approx. 0.75 hectares adjoining generally the public road at Newtown Centre to the north, Newtown Square and apartments to the East and 'Downshire Park' residential development to the west and south. The residential development will consist of 35 No. 1 & 2 bedroom apartment units within a four storey building (Block 1), and 36 No. 2 & 3 bedroom duplex apartments within 3 No. three storey buildings (Blocks 2,3 & 4) comprising 5 No. 1 Bed Units, 48 No. 2 Bed Units and 18 No. 3 Bed Units together with all site development works and proposed access roads, car parking, bicycle parking, footpaths, bin storage, boundary treatments, public lighting, open space, soft and hard landscaping, electricity sub-station/switch room and new vehicular entrance onto the existing public road bounding the site to the north (Opposite Dunnes Stores) together with vehicular services access and provision for a future access to adjoining lands to the east from existing access road alongside the eastern site boundary and proposed connections to main services including surface water attenuation, foul sewers, surface water sewers and watermains at Newtown Centre/Newtown Square, Blessington Demesne, Blessington, Co. Wicklow



In conclusion there is various areas where a much needed community facility can be implemented in the upcoming LAP and we hope that WCC please allocated one or two of these lands for this.

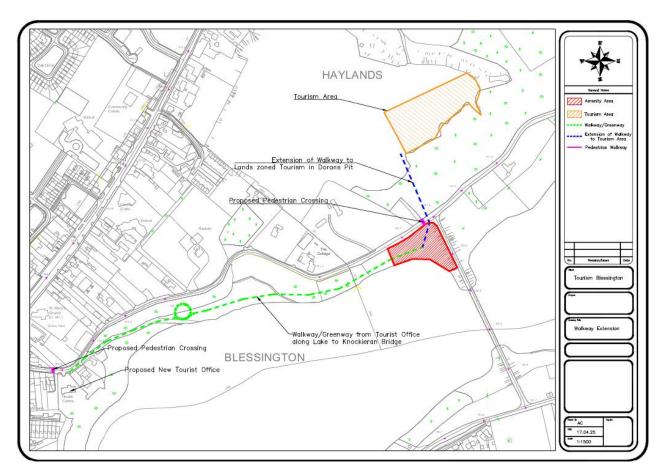


# Proposal 2 - Greenway/Walkways

# Walkway

The Forum was very disappointed to see the refusal for the proposed Greenway by An Bord Pleanala but feel there is adequate scope for a resubmission. We are of the opinion that the refusal provided detailed information (similar to an RFI) that opens the door to a resubmission. We would strongly urge WCC to consider a resubmission considering the information provided in the refusal.

This said we feel that there is excellent possibilities for extensions of existing walkways around the town and development of new walkways that can incorporate the lake and the fantastic view that it offers. Below is a proposal which would develop a new walkway from the newly proposed tourist office along the lake and to stop at Knockieran Bridge. This area could be used as an amenity area and a further walkway extension could be completed once the tourism area is developed.



The above proposal would give an excellent link to the town from these tourism lands all while utilising a route incorporating the tourist office and amenity area.



The images below show what could be possible and has been completed in other areas of natural beauty to encourage tourism, utilise a fantastic view overlooking the lake and an amenity area.















This walkway and amenity area would be a fantastic addition to the town as the town massively underutilises the areas surrounding the lakes and its views for the local communities and for potential tourists.



## Greenway

As from the zoning maps it can be seen that the proposed Greenway has been completely removed. We as a Forum feel that the recently refused Greenway should not be completely discarded and feel a resubmission should be pursued at its earliest convenience. The refusal from An Bord Pleanala has given a clear indication of the insufficient information within the previous submission and clearly outlines the necessary information/surveys required to overcome this refusal.

The below detail outlines how a new submission can overcome this refusal.





#### **Executive Summary: Greenway Planning Refusal & Next Steps**

#### Background

The Blessington Greenway planning application was refused due to unresolved concerns from Dublin City Council and Uisce Éireann regarding potential environmental impacts, particularly on water quality and wildlife conservation in the Poulaphouca Reservoir. This report outlines the key reasons for refusal and the necessary steps to address them in a revised submission.

#### Key Issues Identified

#### 1. Water Quality & Surface Runoff Management

- Dublin City Council cited insufficient details on how surface water runoff would be managed during and post-construction, particularly at bridges, culverts, and parking areas.
- Uisce Éireann highlighted concerns about potential contamination of the reservoir, a key drinking water source.

#### 2. Wildlife & Conservation Concerns

- The potential impact on the Greylag Goose and Lesser Black-Backed Gull, both Special Conservation Interest (SCI) species, was not fully assessed.
- The mitigation plan relied too heavily on post-consent monitoring rather than pre-emptive measures.
- Conflicting reports on otter habitats and suboptimal timing of ecological surveys weakened the application.

#### 3. Gaps in Environmental Assessment

- The Construction Environmental Management Plan (CEMP) lacked comprehensive details on mitigation strategies.
- The Environmental Impact Assessment Report (EIAR) screening raised concerns about incomplete evaluations of potential disturbances.
- Water quality assessments were not sufficiently robust to rule out risks.

#### Path Forward: Key Actions for a Successful Resubmission

#### Enhanced Surface Water Management Plan

Develop and submit a full CEMP with detailed mitigation measures for water runoff, including parking areas and construction phases.

### Comprehensive Wildlife & Conservation Study

Conduct a pre-application assessment of Greylag Goose and Lesser Black-Backed Gull habitats and propose mitigation measures upfront.

#### Robust Water Quality Assessment

Provide a clear, multi-phase water quality assessment covering pre-construction, construction, and operational phases.







Early Engagement with Key Stakeholders
 Establish ongoing dialogue with Dublin City Council and Uisce Éireann to ensure their concerns are proactively addressed.

#### Conclusion

By utilising the previous submission along with the proposals outlined in this report, significant cost, time and effort can be salvaged now rather than ceasing the Greenway proposal. The initial refusal resulted primarily from incomplete responses to regulatory concerns. By addressing these gaps through a revised submission with a stronger environmental and water management strategy, the Greenway project can move forward successfully.

#### Appendix: Key Issues & Solutions

Key Issues	Proposed Solution
Surface Water Runoff Management	Submit a full CEMP detailing water runoff control for bridges, culverts, and parking areas.
Car Parking & Drainage Risks	Redesign parking areas with runoff attenuation measures and submit detailed hydrology reports.
Lack of Wildlife Impact Assessment	Conduct an updated ecological assessment focusing on SCI species and their habitats.
Post-Consent Monitoring Overreliance	Implement pre-emptive mitigation measures before submission instead of relying on monitoring.
Conflicting Otter Habitat Data	Conduct a peer-reviewed ecological survey with optimal timing to resolve discrepancies.
Water Quality Protection Concerns	Perform a detailed water quality study across all project phases to prove no adverse impact.
Gaps in Environmental Reports	Address missing details in the EIAR and Natura Impact Statement, ensuring compliance.
Regulatory Engagement	Maintain proactive dialogue with Dublin City Council and Uisce Éireann to refine the submission.