



Blessington Local Area Plan Submission - Report

Who are you:	Agent
Name:	Cairn Homes Properties Ltd.
Email Address:	[REDACTED]
Reference:	BLESSLAP-210743
Submission Made	April 3, 2024 9:27 PM

File

Blessington LAP PreDraft-Cairn.pdf, 1.4MB

Blessington_Mplan_Submission_April2024.pdf, 2.25MB

CW Memo Blessington (Cushman).pdf, 0.24MB

Our Ref: Blessington LAP

Forward Planning,
Wicklow County Council,
Station Road,
Wicklow Town,
A67 FW96

3rd April 2024

Re: Blessington Local Area Plan 2024-2030 - Pre-Draft Stage Submission by Cairn Homes Properties Ltd

Dear Sir/Madam,

We wish to make a submission on behalf of Cairn Homes Properties Ltd in relation to the new Blessington Local Area Plan. This submission relates largely to Blessington Demesne lands which are in the ownership of Cairn but have the potential to deliver significant public and private infrastructure for the betterment of the entire Blessington community and economy.

Cairn have appointed MOLA Masterplanning Architects to prepare a masterplan which it is hoped will inform the future growth of Blessington in terms of new homes, businesses, schools and public amenities including parks and green infrastructure which in our opinion will ultimately lead to a more sustainable community within the town. The key issues in relation to these lands within the context of the LAP are as follows:

- Built on Cairn's reputation and recent performance of delivering new communities in Co Wicklow and beyond, this submission focuses largely on the key topic of 'Housing-Population-compact Growth' as identified in Wicklow County Council's consultation portal.
- It also refers to the key topics 'Economic Opportunity-Tourism-Shops & Services-Community Facilities' and 'Regeneration of Communities & Places- Healthy Place-Making-Urban Design – Opportunity Sites'.
- The lands at Blessington Demesne form an integral part of the sustainable landbank of Blessington in the short to medium term which should be supported and maintained within the LAP.
- In accordance with the Development Plan Guidelines 2020 the LAP should protect viable zoned lands for future communities.
- Blessington Demesne lands fully comply with the sequential test requirements and are wholly appropriate to zone for development purposes.
- The life of the new Local Area Plan will extend beyond the current County Development Plan. Therefore, the land use zonings for residential, commercial and open space, should provide a vision and framework for long-term change; not just immediate needs.

[Redacted signature block]

- This development plan review process is an opportunity to review the distribution of Employment zoned lands are based on a masterplan created 25 years ago. Market analysis by Cushman and Wakefield (enclosed) highlights that the low-density employment concept for this area is no longer viable, and consideration of an alternative mix of commercial uses is strongly recommended. It is submitted that locating residential along the edge of this parkland would also be a more appropriate and sustainable form of development in the long-term.
- An updated masterplan proposal for the c.14.7 ha. parkland edge by MOLA Architects is provided as part of this submission. This sets out an alternative vision for this area providing for residential and a mixed-use zone including commercial/convenience retail/employment uses.

Cairn is an Irish homebuilder founded in 2014 with a clear strategy to deliver high-quality new homes with an emphasis on design, innovation, and customer service. Cairn is actively engaged in the delivery of some 15,000 homes over the coming years and have to date completed almost 8,000 homes in their short lifetime. In terms of Wicklow, almost 1,100 of these homes have been within the County and it is hoped that this figure can continue to grow in towns like Blessington in the coming years. As well as homes, Cairn have proactively facilitated the delivery of 2 new schools in Wicklow, community and sports facilities, enterprise & community units, public parks, playgrounds and greenways. Cairn is committed to working with Wicklow County Council in the delivery of much-needed new homes together with the associated infrastructure (including the delivery of the BIRR) necessary to deliver new communities with improved and high-quality amenities.

Cairn Homes welcomes the preparation of the Blessington LAP, which will provide an important framework for the development of the town up to 2030 and beyond. They have a keen interest in the sustainable development of the LAP area and have the ability to deliver significant objectives within the plan in collaboration with the Council and other key stakeholders.

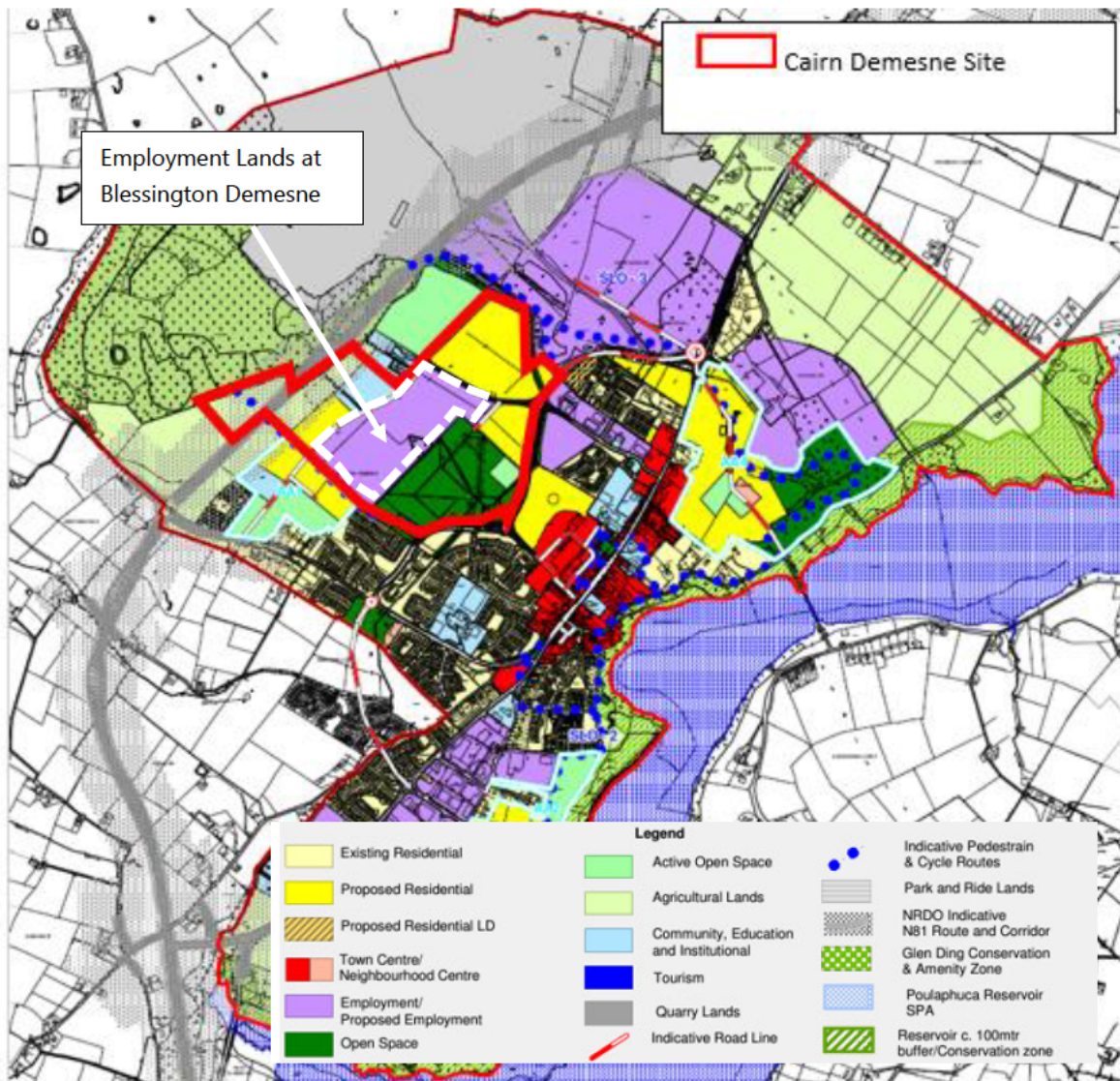


Figure 1: Blessington LAP 2013-2019 Extract with Lands at Blessington Demesne highlighted and Employment Lands identified within white dotted line.

1 CAIRN ROLE IN DEVELOPMENT OF BLESSINGTON

The lands at Blessington Demesne total 63.7 ha with 14.8 ha zoned for residential, 14.7 ha zoned for a town park, 3.4 ha for community uses, 14.7 ha for employment and the balance for agriculture. Cairn is currently constructing 91 houses and part of the town park as Phase 1 of the Blessington Demesne development under P.A Reg. Ref: 20/1146. A large creche on lands adjacent to Phase 1 is permitted under P.A Reg. Ref: 22/1191.

An LRD application has been submitted to Wicklow County Council for Phase 2 of the overall development (P.A. Reg. Ref: 23/689) which included 329 residential units, 10.65 ha of the Town Park and a 700m long section of the Blessington Inner Relief Route to the north. It is currently the subject of a material contravention procedure. The development of these lands will facilitate the delivery of important houses, part of the Blessington Inner Relief Route, a significant c.14 ha town park serving existing and future residents of the town. The land has the potential to deliver other

community facilities, including creches and community buildings and employment uses which will serve the needs of the wider town.

It is Cairns strong opinion that its is not appropriate to wrap the significant public park with employment generating development with minimal opportunity for passive surveillance and activation throughout the day and evening which alternative land uses would offer. The current review of the LAP therefore allows for a reconsideration of the zoning allocation to allow for an improved distribution and mix of more appropriate uses across the area with more permeable connectivity to the north west.



Figure 2: Extent of current LRD application (P.A. Reg. Ref: 23/689) including 329 residential units, 10.65 ha of Town Park and a 700m long section of the Blessington Inner Relief Route to the north.

2 POLICY FRAMEWORK

The LAP will need to comply with the provisions of higher level national, regional and county development plan policies and guidelines in accordance with section 19 of the Planning and Development Act 2000. A number of key policy documents are considered below.

2.1 National Policy

National Planning Framework

The National Planning Framework (NPF) guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development. There are 10 National Strategic Outcomes (NSOs). Those of particular relevance in the creation of Healthy

Placemaking as defined in the Draft Plan include NSO 1- Compact Growth, NSO 4 – Sustainable Mobility and NSO 8 – Transition to a Low Carbon and Climate Resilient Society.

Several policy objectives may be considered applicable to the preparation of the Development Plan.

- **National Policy Objective 3a** - This states that it is a national policy objective to *'deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements'*.
- **National Policy Objective 11** - *'In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.'* -
- **National Policy Objective 32** - *'To target the delivery of 550,000 additional households to 2040 National Policy.'*
- **National Policy Objective 33** - *'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*
- **National Policy Objective 35** - *'Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.'*
- **National Policy Objective 72a** – *'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.*
- **National Policy Objective 72b** – *'When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.'*
- **National Policy Objective 72c** – *'When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.'*

The above policies are of particular relevance to the form, nature and extent of the zoning in Blessington. This Framework targets the consolidation of existing settlements, particularly of cities and large towns. This means that plans will need to relate the population targets to the levels and location of future land-use zoning. Effective implementation will require substantially better linkage between zoning of land and the availability of infrastructure. In the zoning of land, planning authorities are required to apply a tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.

NPO 72b highlights the importance of preparing an assessment of the cost of servicing zoned lands. The NPF also indicates that there are many other planning considerations relevant to land zoning beyond the provision of basic enabling infrastructure including overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops, places of employment accessibility, and to transport services etc. All of these must be weighed upon the determination of what lands should be zoned.

The NPF Roadmap of July 2018 did not form part of the statutory NPF. It forms the basis for housing and population targets for RSES for the Eastern and Midlands Region and is central to the *Housing Supply Target Methodology for Development Planning - Guidelines (Dec 2020)*. All of these documents have informed the core strategy of the Wicklow County Development Plan. However, the assumptions underpinning the population forecasts based on the 2016 census have significantly underestimated population growth, as illustrated in the 2022 Census. The ESRI, who were responsible for the forecasts underpinning the NPF Roadmap have accepted in its report *National*

Development Plan 2023: Priorities and Capacity, that it has underestimated housing demands. It states:

“In spite of the ambition which underpinned the NDP, the latest information which informs the scale of needed investment suggests that the earlier level of ambition may have underestimated what is needed. The figures on population growth from Census 2022, released in May 2023, show a rate of increase which exceeded expectations. In 2022, the population stood at 5.149 million and this was an increase of 8 per cent on the 2016 figure. With population growing more rapidly, the need for extra housing and associated infrastructure is clear.”

Population forecasts are currently being updated, which will feed into a review of NPF forecasts, RSES targets and county development plan housing and zoning requirements. It is evident that there will be increased in housing requirements for the period to 2031. This forms an important element of the current Judicial Review against the Wicklow County Development Plan 2022-2028, which is set within the context of the ESRI’s acknowledgement [2022/922JR]

Development Plans – Guidelines for Planning Authorities (June 2022)

While the subject plan is a local area plan, the Development Plan Guidelines sets out important guidance for the zoning, identification of land use strategies and phasing and sequencing of development. This is of relevance, as the local area plan is setting out the zoning framework and overall form of Blessington. A clear methodology is established for the preparation of the housing demand and zoning requirements across all settlements within the planning authority area. While these guidelines relate to development plans, there are certain provisions that are of relevance to the subject LAP, as the Wicklow County Development Plan 2022-2028 has deferred zoning decisions to individual LAP preparation.

Section 4.4.1 states that:

“It is a policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning”

Section 4.4.3 states:

“In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.”

This is key to ensuring delivery of housing and is important when interpreting the *Housing Supply Target Methodology for Development Planning - Guidelines (Dec 2020)*, and in making the case for an additional 25% in housing supply numbers. The Guidelines introduce an important concept in section 4.4.4, which establishes the concept of ‘*Long-Term Strategic and Sustainable Development Site*’, which may be developed after the 6 year period of the Plan. This is a key concept, which needs to be given due consideration in the Wicklow CDP as it allows for long term planning and investment decisions, which are not otherwise facilitated by the 6 year period of a statutory plan. The Guidelines highlight that the long-term delivery of development parcels or landbanks, is best controlled by a ‘*Sequential Approach*’ to development, which is more agile and responsive to markets, opportunities and constraints than ‘*priority phasing*’ or predictive phasing.

Section 6.2.3 indicates that:

"It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently."

The Guidelines advocate a stepped approach to sequential zoning of lands. The steps are as follows:

- Step 1 – Settlement Capacity Audit will comprise housing estimates for tier 1 and tier 2 services lands.
- Step 2 – In accordance with the sequential test, zoning for residential development land should ensure that this land is closest to the settlement core, including infill and redevelopment sites. The exercise should be based upon quantum of housing that would be delivered on individual parcels
- Step 3 - Tier 1 lands proximate to the core should be zoned first
- Step 4 - Where it is necessary to zone further land which is not serviced, this should be done in a sequential manner.

The Guidelines indicate that the *"...the purpose of the sequential approach is to avoid development 'leapfrogging' to less centrally locations"*.

Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024)

The guidelines highlight that Local Area Plans have a role in translating development plan policies and objectives to a district or neighbourhood level and provide for a more in-depth consideration of planning issues that are specific to a particular area. The guidelines set out policies in relation to settlement, place and density. Policies on density should be tailored to local circumstances. The Guidelines indicate that for Key Towns and Large Town (5,000+ population) it is a policy and objective that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of such towns.

Local Area Plans – Guidelines for Planning Authorities (2013)

The Guidelines highlight that LAPs should contain policies and objectives which:

- Link the local area plan to the corresponding core strategy of the development plan with a clear vision and set of strategies to deliver that vision in the local area plan;
- Focus on identifying and meeting the needs of communities;
- Promote local economic development and employment growth;
- Integrate environmental considerations into local planning, particularly in relation to the effects of climate change, maximising bio-diversity, and providing green infrastructure;
- Ensure that adequate provision is made for schools;
- Encourage smarter travel patterns through more compact, less sprawling, and better structured urban areas and facilitating more sustainable and healthier travel habits such as walking, cycling, and the use of public transport; and
- Deliver high-quality urban design that improves people's quality of life.

Strategies should be developed in conjunction with stakeholders. The accompanying manual indicates that a range of strategies should be investigated and that alternative strategies in conjunction with the SEA process should be developed. These should be assessed against criteria and the appropriate strategy should be brought forward into the plan.

Housing Supply Target Methodology for Development Planning - Guidelines (December 2020)

These guidelines set out how core strategies of development plans should calculate the provision for housing over the period of the Plan. The methodology is somewhat prescriptive and complex. In addition, the Guidelines set out the housing targets for different counties. They allow for an additional 25% to facilitate convergence with the NPF strategy where justified. Such justification relates to compliance with NPF objectives and the provisions of the relevant RSEs.

2.2 Regional Policy

Eastern and Midland Regional Assembly –Regional Spatial & Economic Strategy (RSES) (2019-2031)

The Regional Economic and Spatial Strategy (RSES) sets out 16 Regional Strategic Outcomes (RSOs), including RSO 1 – Sustainable Settlement Patterns and RSO 2 – Compact Sustainable Growth.

In relation to Compact Sustainable Growth,

- ***RPO 3.2:*** *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.*
- ***RPO 3.3:*** *Local authorities shall, in their core strategies identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’.*

The RSES establishes three regions, the Metropolitan Area, the Core Region and the Gateway Region. It also establishes the settlement hierarchy. Metropolitan Key Towns are large economically active service towns located within the Dublin Metropolitan Area, with high quality transport links and capacity for increased residential and employment densities at strategic transport nodes. The RSES identifies Bray and Wicklow as Metropolitan ‘Key Towns’. The next level is Level 4 Self-Sustaining Growth Towns, which are towns that contain a reasonable level of jobs and services which adequately caters for the people of its service catchment. The identification of this level is left to be defined by development plans. This may include sub-county market towns and commuter towns with good transport links, which have capacity for continued commensurate growth. This strategy is summarised below in Figure 3. Blessington may be defined as a self-sustaining growth town.

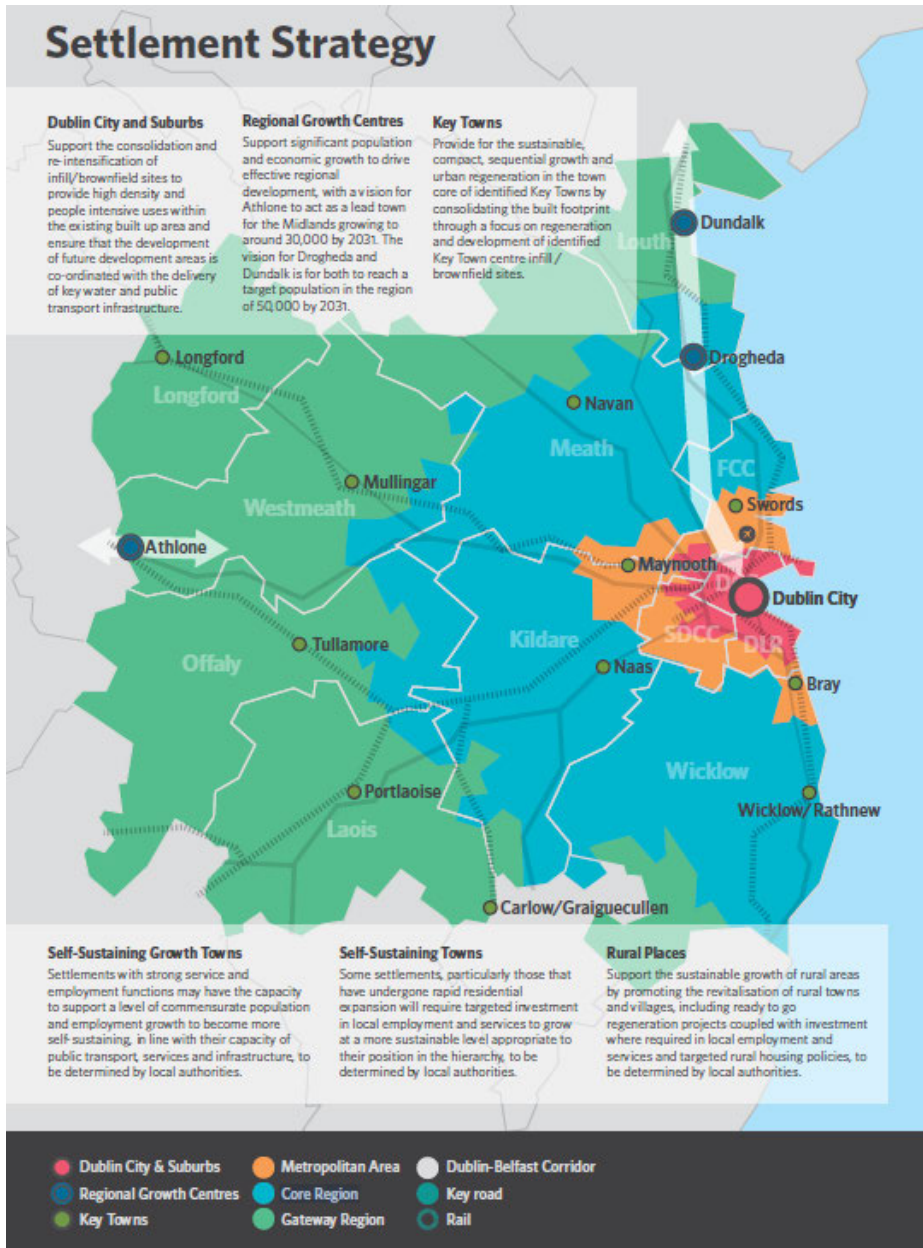


Figure 2: RSES Settlement Strategy

Having regard to the long lead in time for planning, design and development, a prioritisation and indicative phasing has been applied to strategic development areas based on any identified infrastructure and/or site constraints and linked to the delivery of strategic public transport, key infrastructure and service provision. Phasing periods are 2026 (short term), 2031 (medium term) and 2040 (long term).

The RSES breakdown population forecasts for each County in Appendix B. This indicates a population of Wicklow County rising from 142,500 in 2016 to 155,000-157,500 in 2026 and 225-231,500 in 2031. There is a further allowance of transition population targets in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the GDA area.

2.3 Local Policy

Wicklow County Development Plan 2022-2028

Chapter 3 - Core Strategy

The chapter sets out the housing demand to reflect the requirements of the NPF Roadmap and the Ministerial Guidelines issued in December 2020. The housing targets contained in the aforementioned guidelines allow for an increase of 25% over and above the target up to 2026 where justified and to facilitate convergence with the NPF Roadmap. Table 3.4 of the Plan outlines the housing demands on which the Core Strategy and all other figures are based.

The Strategy sets out the settlement hierarchy

- Level 1 – Metropolitan Area Key Town – Bray
- Level 2 – Core Region Key Town – Wicklow-Rathnew
- Level 3 – Core Region Self Sustaining Growth Town – Arklow, Greystones/Delgany, **Blessington**

Towns in Level 3 are targeted for growth rates of 25%-30%, with slight variations based on capacity / past trends. The Plan suggests that growth in Blessington will exceed this target range before the end of the plan period due to legacy housing developments under construction.

Table 3.5 of the Plan sets out the housing targets to Q2 2028 and Q4 2031. It indicates that for Blessington, 393 additional units are required between Q3 2022 and Q2 2028 and a further 81 are required between Q3 2028 and Q4 2031. The settlement strategy, housing target numbers and quantum of required zoned land is set then out in Table A of the County Development Plan. For Blessington, it indicates that the housing target for 2016-2031 is 514 (less completed units 2017-2020), that the development capacity of existing zoned land is 1,450 ha, of which 300 ha is in the built up area, and 1,150 ha is outside the built up area. The table indicates that there is an excess of 31 ha outside of the existing built up area which will be addressed in the LAP. The Development Plan acknowledges in section 3.5 that all of these figures relating to the surplus of zoned land is based on and “...having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA”.

Zoning details are delegated to new local area plans for Bray Municipal District (including Enniskerry and Kilmacanogue); Wicklow Town – Rathnew; Greystones - Delgany – Kilcoole; Arklow and Environs; and **Blessington**.

The Plan sets out the following principles for zoning:

1. Compact Growth – a minimum of 30% of the targeted housing growth shall be directed into the built up area of Level 1 to 4 settlements.
2. Delivery of Housing and Population Targets - Zonings will be structured to deliver the core strategy housing targets.
3. Higher Densities - zonings will be delivered in accordance with higher densities in Ministerial Guidelines.
4. Sequential Approach – priority 1 (town centre/brownfield), priority 2 (RSES strategic sites), priority 3 (infill within existing CSO town boundary), priority 4 (greenfield: tier 1 serviced and sequentially adjacent to town boundary; tier 2 unserviced and sequentially adjacent to town boundary)

Chapter 4 Settlement Strategy- Blessington

Blessington is a designated Level 3 Self-Sustaining Growth Town within the core region of Dublin. It is indicated that the population should increase from 5,234 in 2016 to 6,145 by Q2028. The town is a strong and active town that acts as the service centre for a wide rural catchment and has a strategic location along the N81 in proximity to the Dublin metropolitan area and at the entrance to the west of the County. Re-routing of traffic away from the Main Street, through the provision of the Blessington Inner Relief Route will facilitate regeneration of the town centre. The town should aim to attract employment generating investment and should target investment from foreign and local sources in a mixture of 'people' and 'product' intensive industries.

Chapter 6 - Housing

The Plan sets out key housing principles for the creation of sustainable communities. Sustainable communities require a variety of house types, sizes and tenures. It is important that new multi-unit residential development provides an appropriate mix that caters for a variety of household types and sizes.

Zoning

The zoning / designation of greenfield land for new housing shall adhere to the following principles:

- Application of the 'sequential approach';
- Application of compact growth targets;
- Creation of 'walkable' 10 minute neighbourhoods;
- Promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of any rail or light rail stop or 500m of bus routes will be prioritised;
- Application of the tiered zoning approach in accordance with NPO 72 whereby land that is fully serviced is differentiated from land that can be serviced within the lifetime of the plan;
- Lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritised;
- Cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings;
- Examine environmental constraints including but not limited to biodiversity, flooding, and landscape;
- The need to maintain the rural greenbelt between towns.

Phasing

The development of zoned / designated land should generally be phased in accordance with the sequential approach:

- Development shall extend outwards from the centre of settlements with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;
- A strong emphasis shall be placed on encouraging infill opportunities and better use of under-utilised land; and
- Areas to be developed shall be contiguous to existing developed areas.

Density

Table 6.1 indicates that for large towns including Blessington, the following density provisions should be applied:

- Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.
- Outer Suburban / Greenfield Sites: Minimum density of 35 – 50 dwellings per hectare.
- Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.

It should be noted that the provisions of the Compact Growth Guidelines 2024 specify densities of 30 dph to 50 dph for urban extensions of larger towns.

3 ISSUES PAPER AND SUBMISSION

3.1 Issues Identified by Wicklow County Council

Wicklow County Council has identified a series of ‘key topics’ relating to the emerging LAP. Submissions are made below in relation to these themes.

3.2 Housing – Population - Compact Growth

3.2.1 CDP Housing Targets

Principle 2 relating to zoning, as outlined in the CDP, indicates that development should be delivered in accordance with housing targets. The Issues Paper states that;

“Blessington will need approximately 474 new homes built between 2022 and 2031. To facilitate compact growth, 30% of new homes need to be in the existing built up area and town centre. Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet this housing target. These homes must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment.”

As noted above, the Development Plan suggests that there is 31 ha of land that needs to be de-zoned in the LAP, or defer development beyond the period of the Plan. This is contrary to national policy, as outlined in the Development Plan Guidelines, which clearly state that existing zoned lands should not be down-zoned. This assertion was also made in the context of flawed ESRI population projections.

It has been acknowledged by the ESRI that the forecasts and population targets on which the core strategy figures are based are fundamentally flawed, having regard to the overall level of population growth between 2016 and 2022. The NPF targets will be reviewed which will necessitate amendments to the RSES and the core strategies of development plans. The period of the Plan is not specified, but it should be noted that if a six year plan is proposed, this is likely to run from 2025-2031 and beyond the duration of the current Development Plan, which is very likely to be amended following revised population and household forecasts to be undertaken as part of the update of the NPF. If the Blessington LAP bases its settlement strategy on the housing target numbers in the CDP core strategy, it will be open to the same challenges and uncertainties as the

CDP itself. For these reasons, we respectfully suggest that the Council should base its settlement strategy for the LAP on first principles of availability of services, sequential development, and the delivery of community facilities and services.

Interpretation of Guidelines by Department of Housing Local Government and Heritage

Meath County Council has issued notification of its intent to vary its 2021 County Development Plan, in particular a review of the core strategy, with the intention of ultimately reviewing the zoning objectives of growth towns across the County . It is pertinent to refer to a memo to the Council dated 23 September 2023 by the Acting Assistant Secretary of the Department of Housing, which triggered this Variation and which advised the following:

“..the draft Planning and Development Bill 2022 proposes moving from a 6 year to a 10 year development plan cycle, and it is the Minister's intention to facilitate early transition into the new arrangements, which may also allow for amendments associated with revised housing supply targets.

In the interim, I would draw your attention to certain provisions of the Development Plans - Guidelines for Planning Authorities, issued in July 2022, and the Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities, issued in December 2020, ...

In particular, you may wish to consider the provisions of sections 4.4.1 and 4.4.2 of the 2022 Guidelines as well as section 4.4 of the 2020 Guidelines, which refer to the need to have regard to the rate of take-up and build-out of land, in addition to the remaining duration of permissions (both commenced and uncommenced}, when estimating the requirements for zoning of land for residential purposes to meet housing supply targets in the Core Strategy. Any such estimates must be evidenced-based and justified. The key message is that in cases where planning permission has been granted for housing development on any particular site, it should not automatically lead to the assumption that the particular site will contribute to targeted housing supply during the lifetime of a development plan, and a realistic assessment, based on a range of factors including delivery and performance, should inform this.

You may also wish to consider the potential scope for the identification of Long Term Strategic and Sustainable Development Sites (having regard to the provisions set out within section 4.4.4 of the 2022 Guidelines) in order to provide longer term certainty over likely key development locations.”

The Department's opinion supports Cairn's assertion that the LAP should not be constrained to a 6 year time frame that limits capacity, but rather focuses on a land use framework that provides the most sustainable balance and appropriate location of uses.

3.2.2 Step 1 – Tiering Servicing

The lands which are the subject of this submission are fully serviceable by a potable water supply, foul sewerage and surface water infrastructure. Footpaths serve the lands and the external road network is capable of accommodating development.

3.2.3 Step 2 - Sequential Approach and Compact Growth

The lands at Blessington Demesne fully comply with the principles of compact growth and the sequential test as set out in Principle 1 in the County Development Plan, which seeks a minimum of 30% of the housing target to be provided with the built-up area, and up to 70% of new residential development is allowable on the edge of the settlement. The Development Principles for the Sequential Approach are set out below.

Principle 4 – Sequential Approach classifies the priority locations for new residential development into four categories, which include:

- **Priority 1** – designated 'town', 'village' and 'neighbourhood centre' also referred to as the 'primary zone';
- **Priority 2** – strategic sites as identified by the RSES and the Metropolitan Spatial Area Plan;
- **Priority 3** – infill within the built envelope of the town as defined by the CSO town boundary,
- **Priority 4** – where there is a need for greenfield residential development, a two-tier approach will be taken as per the NPF:
 - Tier 1 – Serviced Zoned Land, whereby the land are able to connect to existing development services and for which there is service capacity available. Such lands would either be located within the existing built-up footprint or be contiguous to existing developed lands. A sequential approach will be applied to zoning.
 - Tier 2 – Serviceable Zoned Land, where the lands are not currently sufficiently serviced but have the potential to become fully serviced. An infrastructural assessment would need to be carried out to justify the zoning of such lands. The sequential approach discussed above would also apply.

MDB has undertaken research of site capacity and planning permissions in Blessington since the LAP came into operation (please see appendix I).

Assessment against Principle 1 – Compact Growth

A minimum of 30% growth target to be delivered within the existing built-up footprint of the settlement. This assertion is based on the following methodology:

We have used the Built-Up Area Boundary (BUA) which was published by Central Statistics Office in June 2023¹, which we have overlaid with the Blessington Local Area Plan (LAP) 2013-2019 zoning map as can be seen in Figure 3 below.

The proposed rezoning of lands at Blessington Demesne does not detract from the potential development of lands zoned either Town Centre, existing residential or proposed residential within the BUA. The LAP has supported the development of BUA lands for 10 year, delivering planning permissions, development in that time.

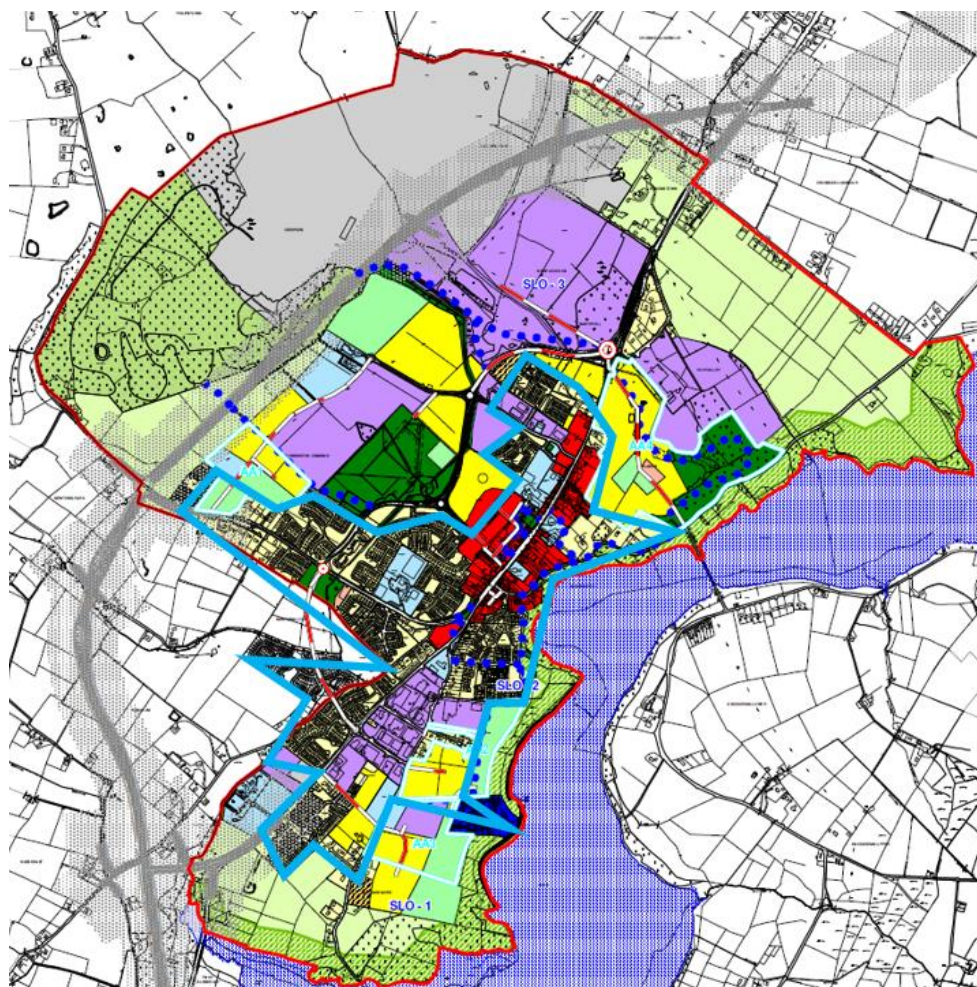


Figure 3: Blessington LAP Zoning Map with the Compact Growth Boundary Overlaid in Light Blue

Principle 4 – Sequential Development (and Phasing)

Settlement Capacity Audit

MDB undertook a detailed mapping exercise to identify sites which could be potentially developed and considered for the purposes of the sequential test. The exercise involved identifying sites with the following Blessington LAP zonings:

¹ Census 2022 Urban Boundaries and Built-Up Areas:
<https://www.cso.ie/en/census/census2022/census2022urbanboundariesandbuiltupareas/>

- Proposed residential (in and out of action area plans) – dark yellow
- Existing residential -light yellow
- Town centre – red

These zoning designations were considered as they both include residential development as a permissible use in section 10.2 of the Blessington LAP. It is important to note that the selection of sites were stand-alone sites. Other backlands along the Main Street would require site assembly and likely proactive land management by Wicklow County Council through the use of compulsory purchase and other methods.

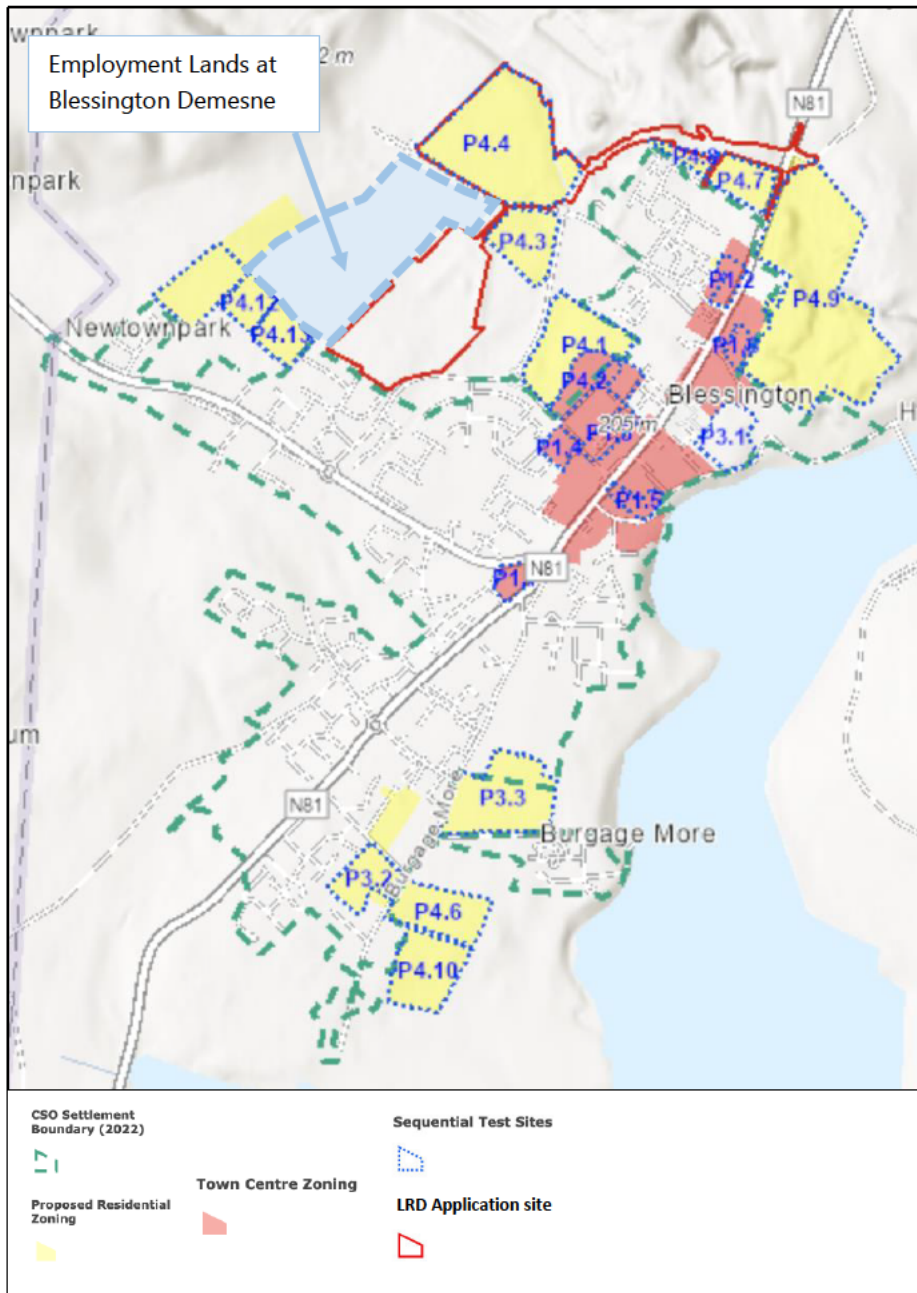


Figure 4: Sequential Test Sites (MDB Analysis)

Identification of lands closest to the settlement core

The Demesne lands are classified as per the categories of priority under Principle 4, which are as follows:

- Priority 1 - designated 'town', 'village' and 'neighbourhood centre' also referred to as the 'primary zone' through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. These are identified as P1 on Figure 4: Sequential Test Sites and consist of the four opportunity sites (OPs) in Blessington LAP within the BUA.
- Priority 2 – Strategic Sites as identified by the RSES and associated MASP. There are no such sites within Blessington area.
- Priority 3 – infill within the built envelope of the town as defined by the CSO town boundary. These are identified as P3 on Figure 4: Sequential Test Sites
- Priority 4 – where there is a need for greenfield residential development, a two-tier approach will be taken as per the NPF.

Having regard to the build-out of the LAP sites over a period of 10 years, it is now appropriate deliver Priority 4 lands that are on the edge of the built-up area adjoining services, schools while delivering new amenities and social infrastructure.

3.3 Conclusions on Sequential analysis for Blessington Demesne

Wicklow County Council's policy through the outgoing LAP has identified town centre sites and supported planning permissions in the Priority 1 area. Having regard to the build-out of the LAP sites over a period of 10 years, it is entirely appropriate at this juncture to deliver Priority 4 lands that are on the edge of the built-up area adjoining services, schools while delivering new amenities and social infrastructure.

There are three sequentially developable sites in the Priority 1 category: P1.1 (Blessington Demesne off Main Street), P1.2 (Dublin Road, Holyvalley) and P1.7 (site bound by Naas Road/Main Street). The remaining sites in this category P1.3 (adjoining Dunnes Stores), P1.4 (facing Dunnes Stores), P1.5 (Foley House, Main St) and P1.6 (Forest View) potentially have constraints in terms of viability and balance of uses. These sites may take longer to come forward for residential development.

Of the three Priority 3 sites, two are sequentially developable: P3.2, (Burgage Castle) with 56 units currently under construction; and P3.1 (Rectory Site) with 45 units currently under construction. Planning permission was previously refused for residential development at P3.3. (Burgage More, Avon Rí) on sewerage capacity constraints.

For the Priority 4 greenfield sites, the non-delivery of the BIRR placed constraints on P4.1 (Blessington Demesne East Phase 1), P4.2 (Blessington Demesne East Phase 2), P4.3 (Blessington Demesne West Phase 1) and P4.7 (Santry Hill 1). They have been classified as Tier 2. In addition,

P4.8 (Santry Hill 2) and P4.9 (Doran's Pitt) have waste water constraints and have been classified as Tier 2. P4.10 (Burgage More South), P4.11 (Site to the rear of Glen Ding estate P4.12 (Site adjacent to P4.11) and P4.13 (Site to the east of Deepark Walk) are also likely to be considered as Tier 2.

Therefore, there are sites outside the BUA that can be reasonably classified, at this point in time, as sequentially developable and thus Tier 1. These include P4.6 (Burgage More) currently under construction by the NDFA and WCC, and the Cairn LRD site P4.5 (Blessington Demesne West Phase 2), as it is contiguous to the existing settlement, is serviceable by foul and surface water sewerage, and critically will deliver the BIRR thereby removing a critical service constraint in this part of Blessington.

Figure 4 highlights that the Employment lands at Blessington Demesne provide the most sustainable and appropriate location for the future of settlement on the eastern edge of the new parkland. This supports the maintenance of a compact settlement form while accommodating future capacity and demand for residential communities.

3.4 Regeneration of Communities & Places- Healthy Place-Making-Urban Design – Opportunity Sites

The local area plan has the opportunity to focus on creating viable and sustainable communities. It is surprising that the Pre-draft Key Topic does not recognise the importance of Blessington Demesne parkland as a significant amenity asset for the town in terms of *Communities & Places-Healthy Place-Making-Urban Design*.

The development of the Blessington Demesne lands will deliver a strategic amenity for the town overall in order to achieve more vibrant and sustainable communities.

The ongoing development of phase 1 lands, and current LRD application with Wicklow County Council can deliver much needed residential capacity, amenity and social infrastructure for the town.

The development accommodates a mix of unit types and sizes which cater for the housing needs of the different age groups and household sizes, thereby responding to the evolving needs of the community.

In addition to the large area of open space, it facilitates green routes and creche facilities which will serve both the future residents, but also those existing residents in the surrounding area. Of critical importance for the future development of Blessington, the project provides for the delivery of the Blessington Inner Relief Road.

The proposed masterplan prepared by MOLA architects seeks to build on the ongoing investment in the new parkland as a green heart and centre-piece for the town and its's new communities. There are opportunities to connect key green infrastructure and amenity facilities such as Blessington Lakes and Glen Ding Woods to this central public open space.

In terms of Urban Design it is submitted as vitally important that the LAP not only refers to the value of the Demesne Parklands, but also considers the type, use and form of development that would provide an edge to the park. ,

It is submitted that the concept of an 'Employment Zone', perhaps in the 'City West' model is now outdated and is somewhat of a relic of a previous masterplan for the area (25 years ago). Rather, the potential of the northern edge of the park should be explored and articulated in the LAP in the context of Healthy Place-Making. Commercial premises do not lend themselves to be attractive connections through to a public park. They tend to have hard obtrusive boundaries with CCTV guarding the premises for security purposes. This is all necessary for various reasons but would not be an appropriate backdrop of a historic demesne and public park. and as noted lack passive surveillance and activation which are critical elements to the successful functioning of a public park

The provision of a "mixed-use" commercial zone would better support local employment in continuity with the current zoning and provide better linkage and integration to the adjoining education, residential and amenity lands.

The enclosed Masterplan identifies the opportunity to provide a new Parkland Residential quarter of some 4.6 hectares bounded by north-south green routes as a sustainable expansion zone for the town westerly towards Glen Ging Woods.

Cairn are aware of various sporting organisations continued growth in the town and the demand for improved facilities for existing and future members. On this it is noted that within the new public park the following facilities are constructed and will soon be publicly accessible:

- bowling green,
- tennis courts
- active open space or kick-about area
- public playground

There remains uncertainty on the new N81 NRDO project to the west of the town. Where this reservation to be omitted there is significant opportunity to consider alternative uses and additional facilities on the periphery of the town abutting Glen Ding Woods and accessible by the permitted and part constructed Greenway.



Figure 5: Proposed Masterplan layout (Source: MOLA Architects)

3.5 Employment Objective Review

The issues paper key topic ‘Economic Opportunity-Tourism-Shops & Services- Community Facilities’ states ‘It is important to protect the traditional role of the town/village centres as the primary retailing and business core, while also facilitating their expansion’.

It is respectfully submitted that an excess of employment lands is provided in the outgoing LAP and that it is appropriate to reduce the quantum in Blessington Demesne in order to focus employment use on the town centre.

Rationale for designation of employment lands under outgoing LAP

Section 4.4. of the Blessington LAP 2013 to 2019 explained the strategy for employment was designed to provide a sustainable ‘jobs ratio’ and to complement and facilitate the strategies of the County Development Board (CDB) and County Enterprise Board / Enterprise Ireland and the IDA. Appendix A explains that the allocation of greenfields lands for employment in the LAP was not based on market analysis but “*was required in order to meet the projected employment requirements for the plan population and its immediate environs.*”

Analysis in Appendix A of the outgoing LAP concluded that even if all lands and buildings currently in employment use were utilised to their potential maximum capacity, there would still be a need to designate sufficient greenfield lands to accommodate up to 1,730 new jobs. An increase of 75%,

which was considered appropriate given the status of Blessington in the County settlement and employment hierarchy.

Table 4 of Appendix A of the LAP considered that the 15.86ha Employment lands at Blessington Demesne could provide for 846 employees at a plot ratio of 0.4 (employee ratio of 75 per sq.m.)

Policies E5 and E6 are notable:

E5 To require the design and layout of employment lands located at Blessington Demesne to provide for a pedestrian walkway (linked to the proposed public park) along the southern boundary, adjoining Action Area 1.

E6 To facilitate and encourage the exploration and exploitation of minerals in the plan area in a manner, which is consistent with the principle of sustainability, the protection of residential, environmental and tourism amenities within the plan area and the objectives of the Wicklow County Development Plan 2010 – 2016 in particular section 8.3

Under the Zoning Matrix in the LAP, suitable uses included Car Parks, Heavy Vehicle Parks, Industry, Motor Sales Outlet, Offices, Petrol Station, Recreational Building, Retail Warehouse, Shops (other) and Warehousing/Distribution.

Market Analysis

Cairn Homes Properties commissioned Cushman & Wakefield to undertake analysis and obtain advice on the 'Employment' zoned lands in relation to viable commercial uses that could be considered for development under the current land use zoning policy. This advice note is enclosed as part of this submission for the planning authority's consideration.

Cushman & Wakefield (C&W) highlight that there have been, and remains, significant challenges in identifying viable development proposals for this area which align with the planning criteria and are considered commercially viable.

It is C&W's advice that there is **limited tenant /occupier demand for a number of the standard commercial uses typically considered within Employment zoned lands, such as offices and industrial**. In addition to the low demand levels, their analysis has also determined that the commercial market terms achievable in locations such as Blessington are well below the levels required for new development to be considered feasible. In some instances, market rents would need to increase by in excess of 100% before a new development could achieve the required returns to be considered viable and have the ability to secure the required development finance.

C&W highlight the current N81 **not fit for purpose for the majority of industrial or logistics occupiers**. With no commitment to deliver the upgrade of the N81 within the lifetime of the current National Development Plan (up to 2030), the appeal of Blessington for industrial / logistics occupiers is unlikely to improve in the coming years. Given this lack of demand there is no basis or viability case to support new industrial / warehouse development in this location at present.

In planning terms, uses such as warehousing or distribution hubs would have a negative impact on the residential amenity of Blessington Demesne, detracting from the investment in Parkland for the town.

C&W highlight that Blessington isn't considered an established business location, with no major business centre in close proximity to the town also. As such, the demand levels and commercial terms achievable for this use in this location are not sufficient for new office development to be considered a feasible proposition. Blessington is not unusual in that regard, with limited new office developments being carried out in the vast majority of regional towns and cities, due to the viability constraints.

For **Retail Warehouse** use, C&W consider that the current relatively low population of Blessington and the catchment area, as well as the accessibility issues, means that new speculative development in this location cannot be considered a viable proposition. The proximity to Naas which has two existing retail parks (Naas Retail Park and Globe Retail Park), also means that there are sufficient services available within a reasonable travel time for the current Blessington population.

Proposed alternative uses in a mixed use zone

There is a need to consider other forms of development which cater for employment, including potentially a service centre, employment hub and filling station and offices on the site. To retain a solely employment type zoning on these lands is likely to result in the non-development of important accessible, central and fully serviced lands. The objective to attract employment to Blessington is not dependent on zoning 15 ha greenfield lands, but enhancing the value and attractiveness of the area for investors, commercial operators and employers.

Overall, it proposed that the concept for the employment lands should be reconstituted as a mixed-use service and commercial zone that integrates with adjoining education, residential and parkland uses. There is a strong synergy with adjoining land uses and good access via road and greenway. A mixed use zone would facilitate joint trips to school pick-ups, sports and recreation activities as well as providing services to residential neighbourhoods on their doorstep. It is an accessible site with links to the town core through the park. It's development as a mixed-use zone would not detract from primary function of core area as a comparison destination; limited opportunity site elsewhere.

Commercial/Service Hub

C&W consider that there may be potential to explore the opportunity for a **Co Working Hub** to be developed on part of the lands, subject to establishing the local community requirement and conducting further due diligence on the development requirements of same.

Retail

The 'Employment' lands are in a suitable location for retail use. Convenience shopping won't detract from primary function of core area as a comparison destination; given limited opportunity sites elsewhere. C&W advise that retailers have expressed an interest in this location.

The zoning in the LAP states that 'Shop (other)' is permitted in principle under this zoning. While there is no clear definition as to exactly what this includes, it is assumed various forms of retail, save for those which are classified as 'local' shops, would be considered permitted in principle.

The potential inclusion of traditional retail units within any new development on the subject lands, would be dependent on the successful delivery of a substantial anchor unit such as the Supermarket option. Without this, C&W don't believe there would be adequate footfall / passing trade to sustain the required trading levels for these retailers.

If a Supermarket was to be developed, there would be scope for exploring the inclusion of some complimentary retail uses adjacent to this. However, as retail can be somewhat volatile, more detailed analysis as part of a wider development proposal would be required to establish the viability of same.

The location of the subject lands also makes it convenient for anyone who will be residing in the residential dwellings from the adjoining Cairn developments. Having a Supermarket adjacent will be considered a significant benefit for residents, and vice versa for a retail operator who will have a considerable population on their doorstep once the new schemes are delivered.

Service Station

Petrol Station is currently allowable under the Employment Zoning Objective. There are currently three petrol / service stations in Blessington, with the nearest one located approximately 600m east of the subject lands along the main street, with another two filling stations further down on the main N81 route through the town.

With the progression of the new Blessington Inner Relief Road (BIRR), that will effectively act as bypass of the main street in the town for traffic travelling north and south, additional service station and ancillary retail use warrant further consideration. Having these services located proximate to the BIRR route will assist with re-directing traffic from the main street, which is one of the key objectives of the relief road.

3.6 Transport and Infrastructure

The sites can be developed to the satisfaction of Uisce Eireann and with appropriate surface water infrastructure can be put in place. Contributions from the development of these lands to any upgrades in required infrastructure (including the Waste Water Treatment Plant (WWTP)) can be achieved through the application of development contributions or land value sharing tax, as required.

The delivery of the BIRR road infrastructure as part of the current LRD residential scheme will have a positive impact on movement in the town and allow the release of valuable residential lands.

The mixed-use commercial quarter and residential quarter illustrated in the MOLA masterplan would be linked to the town centre via green ways through the parklands supporting active travel and sustainable movement patterns.

4 CONCLUSIONS AND SUMMARY

The 'Pre-Draft' documentation on Wicklow County Council's Consultation Portal outlines high level 'Key Topics' which will be developed in significant further detail as the LAP progresses to the Draft Stage. Cairn Homes Properties' principle points of submission at this stage are as follows:

- The lands at Blessington Demesne form an integral part of the sustainable landbank of Blessington in the short to medium term which should be supported and maintained within the LAP.
- In accordance with the Development Plan Guidelines 2020 the LAP should protect viable zoned lands for future communities. There should be no downzoning of lands within the LAP area, and that the provisions relating to zoning and phasing should not be guided by the core strategy figures in the CDP which are currently subject of legal challenge
- Blessington Demesne lands fully comply with the sequential test requirements and are wholly appropriate to zone for development purposes. Our analysis of the core Blessington Urban Area identifies that there sufficient planning permissions to support town centre development, but that there has been limited implementation of projects on edge-of-centre sites, held back by infrastructure constraints.
- The life of the new Local Area Plan will extend beyond the current County Development Plan. Therefore, the land use zonings for residential and open space, should provide a vision and framework for long-term change; not just immediate needs for some 474 dwellings.
- The approach to the zoning of land should be based on first principles of availability of services and the sequential test.
- This development plan review process is an opportunity to review the distribution of (low density) Employment zoned lands which was based on a 25 year old masterplan. It is submitted that a residential/mixed use edge to his parkland would be more appropriate and sustainable in the long-term.
- An updated masterplan proposal for the 14.7 ha. parkland edge by MOLA Architects is provided as part of this submission. This highlights the urban design opportunity to provide a vision of an urban edge to the Parklands to include residential and mixed-use/commercial quarters.

Blessington has the potential to provide for much needed housing in the form of sustainable communities and Cairn have a strong record in delivering on all elements to support communities. With the requested inputs, the LAP can provide a strong and robust framework to guide development going forward.

Cairn Homes Properties' look forward to further detailed engagement with the Planning Authority as the LAP progresses to the Draft Consultation stage.

Yours faithfully,

MacCabe Durney Barnes

Jerry Barnes

Director

MACCABE DURNEY BARNES

Encl./

- Cushman & Wakefield Memo – Blessington Commercial Lands
- MOLA Architects Masterplan for Blessington Demesne

Appendix 1 – Sequential Site Analysis

Site Ref	Address	Size (ha)	Zoning	Planning Reference	Status	Permitted Units	Comments	Sequential Assessment
Priority 1 (P1) - Primary Zone								
P1.1	Blessington Demesne, off Main Street	0.56	Town Centre	WCC. 191020 /ABP.306425-20	Permitted / Extant	58	Multiple changes of ownership in a short time	Sequentially developable
P1.2	Dublin Road, Holyvalley, Blessington	0.35	Town Centre	n/a	n/a		No proposals	Sequentially developable
P1.3	Car park abutting Dunnes Stores, Haylands, Blessington	0.53	Town Centre	n/a	n/a		Mixed use required. Viability challenges without supermarket at ground floor.	Alternative use preference, viability constraint
P1.4	Site facing Dunnes stores	0.73	Town Centre	WCC.141663	lapsed	34	Mixed use approved	Viability constraint
P1.5	Foley House, Main Street	0.55		WCC.19940	Permitted / Extant		Approved for nursing home - preferred alternative use	Alternative use preference
P1.6	Forest View, Dublin Road, Haylands, Blessington	0.47	Town Centre	n/a	n/a		Active economic activity	Existing use constraint
P1.7	Site bounded by the Naas Road (R410) & Main St (N81)	1.04	Town Centre	WCC.905566	lapsed	26	Earmarked as opportunity site in LAP	Sequentially developable
Priority 3 (P3) - Infill within built envelope								
P3.1	The Rectory, Kilbride Road, Blessington, Co. Wicklow	2.05	Existing residential	WCC: 20108	Permitted / Extant	45	Under construction	Sequentially developable
P3.2	Burgage Castle Burgage More	2.10	Proposed residential	WCC: 19693 / ABP. REF.306198-19	Permitted / Extant	56	Under construction	Sequentially developable
P3.3	Burgage Avon Rí More,	5.50	Proposed residential	WCC.038220 and 041033	Refused		Ground of refusal related to lack of WWTP capacity & water supply capacity. Site owned privately	Services/planning constraint
Priority 4 (P4)- Greenfield residential (Tier 1)								
P4.1	Blessington Demesne East Phase 1		Proposed residential	WCC: 20184 / ABP.REF.30857 8-20	Permitted / Extant	77	Delivery bound to the delivery of BIRR by condition. RZLT submission PA Ref: WW-RZLT-12. Case based on non delivery of road	Services/planning constraint (Tier 2)

Site Ref	Address	Size (ha)	Zoning	Planning Reference	Status	Permitted Units	Comments	Sequential Assessment
P4.2	Blessington Demesne East Phase 2		Proposed residential	WCC.20362	Permitted / Extant	96	Delivery bound to the delivery of BIRR by condition. RZLT submission PA Ref: WW-RZLT-12. Case based on non delivery of road	Services/planning constraint (Tier 2)
P4.3	Blessington Demesne West Phase 1	3.30	Proposed residential	WCC.201146	Permitted / Extant	94	Delivery bound to the delivery of BIRR by condition	Services/planning constraint (Tier 2)
P4.4	Blessington Demesne West Phase 2	9.75	Proposed residential	Current application		329	Delivers road and park	Sequentially developable (Tier 1)
P4.6	Burgage More	3.50	Proposed residential Town Centre	WCC 211404	Permitted / Extant	106	Construction tender ongoing through NDFA	Sequentially developable (Tier 1)
P4.7	Santryhill 1	1.68	Proposed residential	WCC 211396	Refused	56	Premature pending final design of the BIRR. WW-RZLT-18	Services/planning constraint (Tier 2)
P4.8	Santryhill 2	1.40	Proposed residential	n/a	n/a		Active quarry, RZLT submission PA Ref: WW-RZLT-43 - Appeal VY27.316674. Case is based on inadequate sewerage	Services/planning constraint (Tier 2)
P4.9	Doran's Pit, Dublin Road, Holyvalley, Blessington	17.01	Proposed residential and AOS	n/a	n/a		Active quarry, Planning Authority Case Reference: WW-RZLT-43 - Appeal VY27.316674. Case is based on inadequate sewerage	Services/planning constraint (Tier 2)
P4.10	Burgage South	More 9.24	Proposed residential	n/a	n/a		Stables. Owner deceased	Landowner constraint/Leapfrogging (Tier 2)
P4.11	Site to the rear of Glen Ding estate	1.75	Proposed residential & CE	n/a	n/a		Owner deceased	Landowner constraint/Leapfrogging (Tier 2)
P4.12	Site adjacent to P4.11	1.15	Proposed residential AOS	n/a	n/a			Landowner constraint/ (Tier 2)
P4.13	Site to the east of Deepark walk	1.25	Proposed residential and AOS	n/a	n/a			Landowner constraint/Leapfrogging (Tier 2)



BLESSINGTON MASTER PLAN

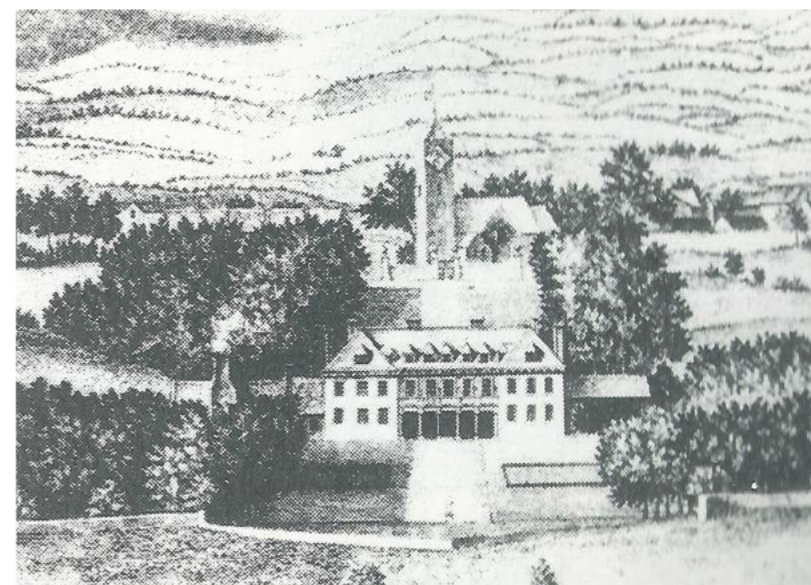
INITIAL STUDY - APRIL 2024

MOLA
Architecture

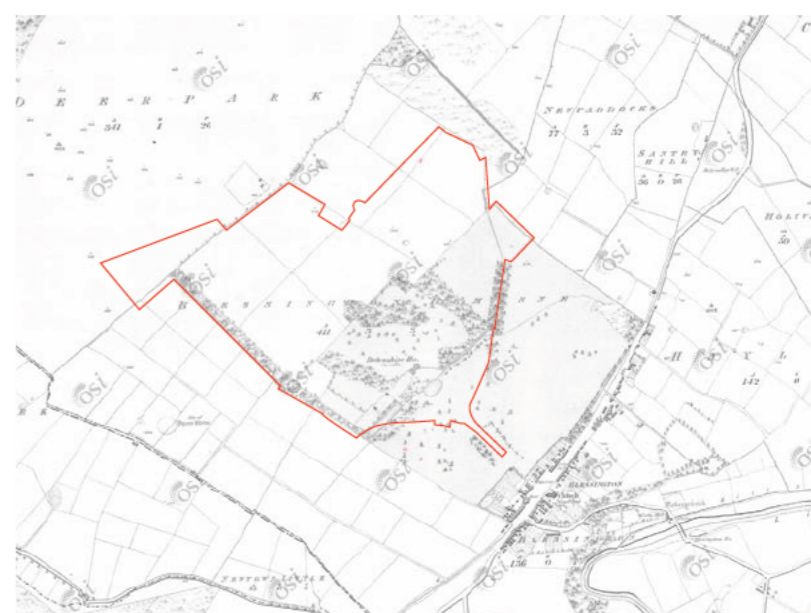
CONTENTS

1.0 Historic and Natural Landscape	P.03
1.1 Topography	
1.2 Historic Axis Enhancement	
2.0 Land Use	P.06
2.1 Existing WCC Land Use Map and Land use Matrix	
3.0 Strategy	P.07
3.1 Access & Movement	
3.2 Enhanced Landscaping / Screening	
4.0 Masterplanning Strategy	P.09

1.2 HISTORIC AND NATURAL LANDSCAPE - HISTORIC AXIS ENHANCEMENT



A lithograph of Downshire House c.1675
(Source: Blessington.info)



Historical Map 1829-1842 (Source: OSi)

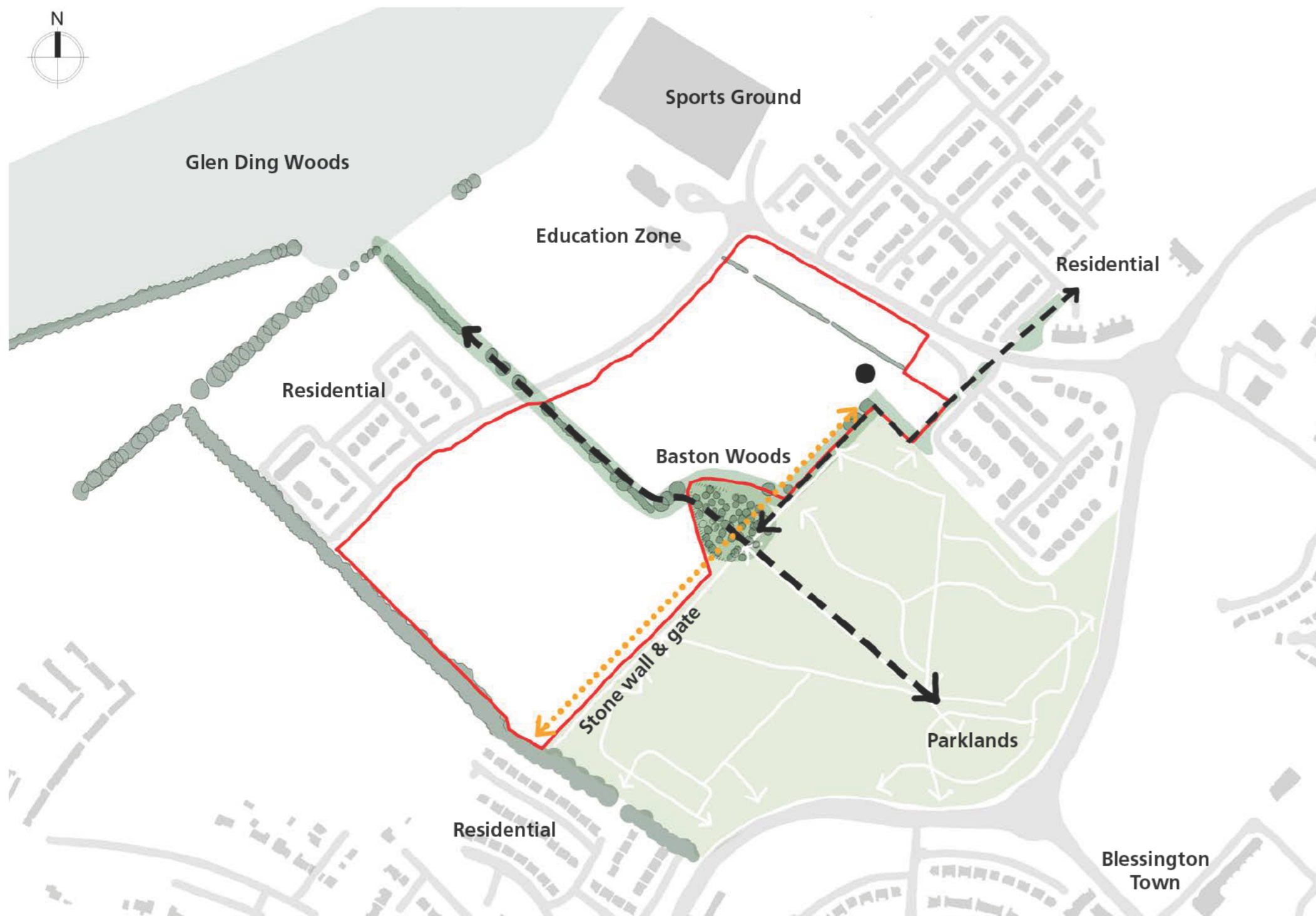


Landscape Axis
- View Towards Church



Town Axis: Main Street

1.2 HISTORIC AND NATURAL LANDSCAPE - HISTORIC AXIS ENHANCEMENT



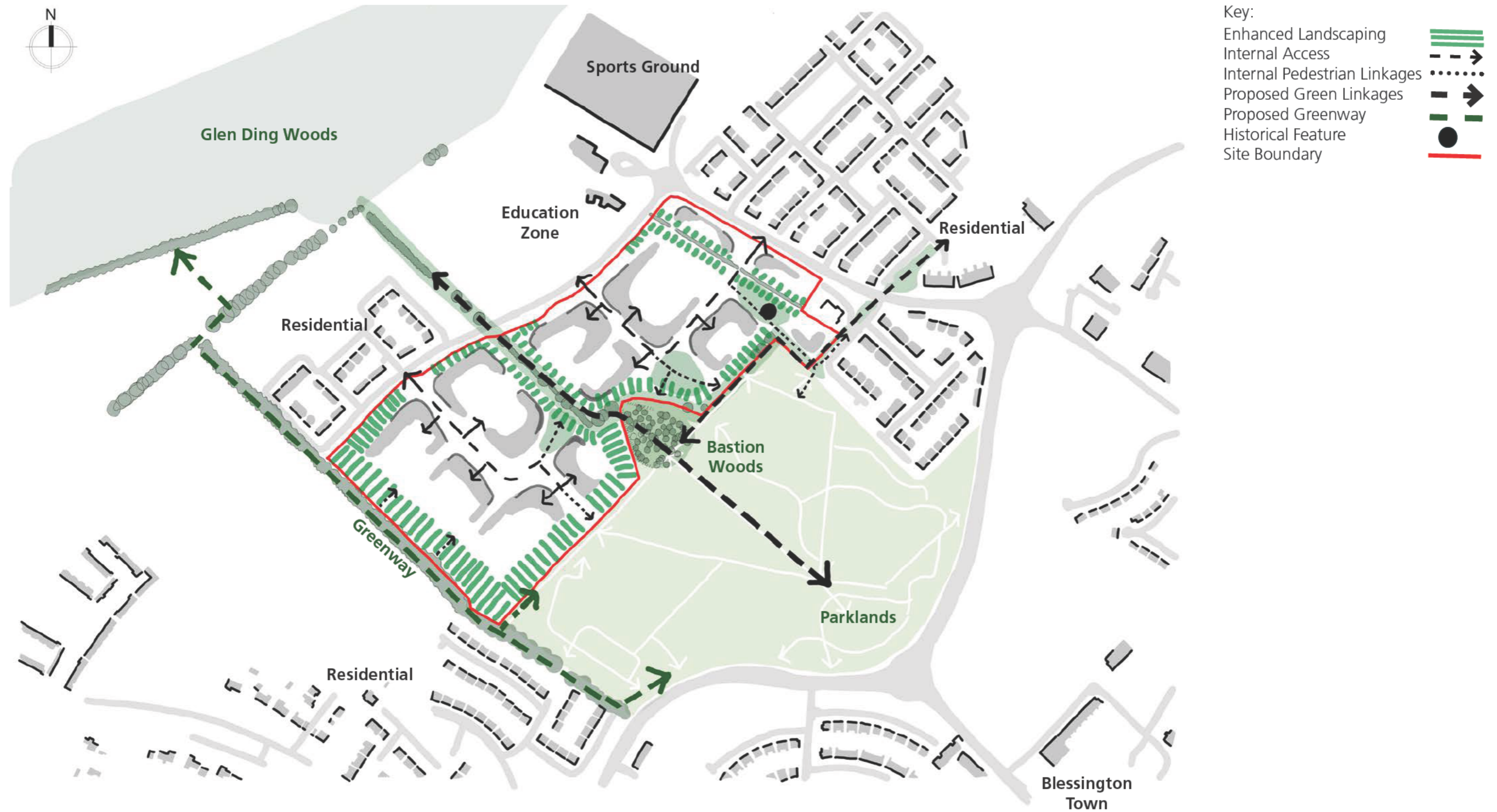
Key:
 Existing Hedgerow
 Historical Feature
 Existing Stone Wall
 Existing Woodlands
 Site Boundary
 Desire Lines/ Linkages



3.1 STRATEGY - ACCESS & MOVEMENT



3.2 STRATEGY - ENHANCED LANDSCAPING / SCREENING



4.1 MASTERPLANNING STRATEGY



INITIAL MASTERPLANNING STRATEGY



MOLA
Architecture

[Redacted]

[Redacted]

[Redacted]

Ireland

[Redacted]

[Redacted]

Cushman & Wakefield Memo – Blessington Commercial Lands

Cushman & Wakefield has been retained commercial property advisors for Cairn on their Blessington lands since 2021. As part of the scope of services carried out to date, we have provided analysis and advice to Cairn on the 'Employment' zoned lands in relation to viable commercial uses that could be considered for development under the current land use zoning policy.

As part of the overall Masterplan considerations for the lands, we have worked closely with Cairn and their professional and technical advisers on feasibility studies for a wide range of potential uses. Throughout this process, significant challenges have emerged in identifying viable development proposals which align with the planning criteria and that can be considered commercially viable.

Within this Memo we have provided a high level summary on the commercial development options we have evaluated to date, which includes the following:

- Retail & Retail Warehouse
- Petrol Station / Service Station
- Offices
- Industrial / Warehouse & Distribution

In the following section we have provided commentary in relation to the viability of developing these commercial uses on the subject lands.

RETAIL & RETAIL WAREHOUSE

The 'Employment' land use zoning in the LAP states that 'Shop (other)' is permitted in principle under this zoning. While there is no clear definition as to exactly what this includes, we have assumed various forms of retail, save for those which are classified as 'local' shops, would be considered permitted in principle.

In this regard, we have carried out a feasibility assessment with Cairn and their professional team on a Supermarket being developed on a self-contained site within the overall commercial lands. We have outlined the rationale and feasibility of this proposal in the below section.

SUPERMARKET

We believe this location would be attractive for a Supermarket operator given the catchment area that Blessington serves and the ability to provide a self-contained site with substantial parking facilities, which is not easily available within the town at present.

The location of the subject lands also makes it convenient for anyone who will be residing in the residential dwellings from the adjoining Cairn developments. Having a Supermarket adjacent will be considered a significant benefit for residents, and vice versa for a retail operator who will have a considerable population on their doorstep once the new schemes are delivered.

In relation to the demand for this use from potential purchasers / tenants, we have carried out initial market sounding exercises with a number of operators, with a positive reaction received to date. The feedback from these parties has re-emphasised the lack of availability of suitable self-contained sites within Blessington, which provide the facilities and customer experience required to facilitate a successful trading environment. The consensus from these parties was that a suitable site within the subject landholding, would facilitate all necessary requirements from an operations and trading perspective.

RETAIL UNITS

The potential inclusion of traditional retail units within any new development on the subject lands, would be dependent on the successful delivery of a substantial anchor unit such as the Supermarket option discussed above. Without this, we don't believe there would be adequate footfall / passing trade to sustain the required trading levels for these retailers.

If a Supermarket was to be developed, there would be scope for exploring the inclusion of some complimentary retail uses adjacent to this. However, as retail can be somewhat volatile, more detailed analysis as part of a wider development proposal would be required to establish the viability of same. Consideration would also be needed on the general demand levels for retail in Blessington and also the availability of retail property along the main street, and whether the development of new retail units in this location was justifiable in that context.

RETAIL WAREHOUSE

For Retail Warehouse use, we believe that the current relatively low population of Blessington and the catchment area, as well as the accessibility issues, means that new speculative development in this location cannot be considered a viable proposition. The proximity to Naas which has two existing retail parks (Naas Retail Park and Globe Retail Park), also means that there are sufficient services available within a reasonable travel time for the current Blessington population. We have also approached retail warehouse occupiers with active requirements in the Irish market in relation to Blessington as a trading location, with their feedback in line with our commentary above in relation to low passing trade and accessibility concerns. As a result, no firm interest has been expressed by any of these occupiers to date.

OFFICES

In relation to office development, Blessington isn't considered an established business location, with no major business centre in close proximity to the town also. As such, the demand levels and commercial terms achievable for this use in this location are not sufficient for new office development to be considered a feasible proposition. Blessington is not unusual in that regard, with limited new office developments being carried out in the vast majority of regional towns and cities, due to the viability constraints.

However, there has been some recent positive activity with regard to co-working / shared office hubs being developed in regional towns, particularly since the increase in remote working following the Covid 19 pandemic. The majority of these hubs are developed and operated by state funded bodies or enterprise groups, with the aim of retaining local workers in the town who otherwise may have to travel to their normal place of work to avail of the required technology etc. Further discussions with the Local Authority, enterprise groups and public representatives would be required to establish if there is sufficient support in the local community for this use in Blessington, following which further assessments could then be carried out.

PETROL STATION / SERVICE STATION

There are currently three petrol / service stations in Blessington, with the nearest one located approximately 600m east of the subject lands along the main street, with another two filling stations further down on the main N81 route through the town.

With the progression of the new Blessington Inner Relief Road (BIRR), that will effectively act as bypass of the main street in the town for traffic travelling north and south, additional service station and ancillary retail use warrant further consideration. Having these services located directly along the BIRR route will assist with re-directing traffic from the main street, which is one of the key objectives of the relief road.

We have held preliminary discussions with service station operators on the subject location, and positive feedback has been obtained to date from some operators. The completion of the BIRR is seen as critical piece of infrastructure to provide the trade levels required to sustain this use, and therefore any potential development of a service station will be dependent on the delivery of the BIRR project.

INDUSTRIAL / WAREHOUSING & DISTRIBUTION

There are some limited existing industrial uses evident in Blessington, with the main cluster concentrated in Blessington Industrial Estate, on the south-west boundary of the town. There are some industrial units also located in Blessington Business Park, which is in close proximity to the subject lands, to the north of the town. Uses here include a Motor Showroom, Printworks, an Auto Parts & Tyre Centre, and Fitness Studios.

Although Blessington and Naas are both a similar distance from the M50 Motorway (20km), Blessington lags behind Naas significantly in relation to road infrastructure, with the current N81 not fit for purpose for the majority of industrial or logistics occupiers. With no commitment to deliver the upgrade of the N81 within the lifetime of the current National Development Plan (up to 2030), the appeal of Blessington for industrial / logistics occupiers is unlikely to improve in the coming years.

Given this lack of demand there is no basis or viability case to support new industrial / warehouse development in this location at present, and we don't see this changing until an upgrade of the N81 route is completed which appears to still be a long term aspiration.

Conclusion

As summarised in the previous section, there is limited tenant / occupier demand for a number of the standard commercial uses typically considered within Employment zoned lands, such as offices and industrial. In addition to the low demand levels, our analysis has also determined that the commercial market terms achievable in locations such as Blessington are well below the levels required for new development to be considered feasible. In some instances, market rents would need to increase by in excess of 100% before a new development could achieve the required returns to be considered viable and have the ability to secure the required development finance.

However, the assessments on some Retail uses along with a Petrol Station / Service Station have shown that these could be considered viable propositions moving forward, in relation to both interest levels from occupiers and the commercial market terms achievable. As such, these uses are now being considered further within the Masterplan assessments and proposals for the lands.

In relation to potential alternative uses to those discussed above, we have not established any other feasible development propositions, from a commercial perspective, which are permitted in principle under the current 'Employment' zoning for the lands. As outlined previously, there may be potential to explore the opportunity for a Co Working Hub to be developed on part of the lands, subject to establishing the local community requirement and conducting further due diligence on the development requirements of same.

Based on our findings outlined above, we would strongly agree with the proposals set out in the MacCabe Durney Barnes submission that a significant reduction in the 'Employment' zoned lands is warranted, given the limited commercial development options available. We also believe that the inclusion of a new mixed-use zoning on the remaining commercial lands would further aid the viability prospects for the commercial uses currently being considered, and would be a more appropriate zoning to compliment the adjoining residential and parkland uses within the overall land holding in Blessington.