



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

Who are you:	Private Individual
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Topic

LAP - Proposed Material Amendments No 26 Submission

Submission

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

Proposed Material Amendment 26:

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

The town boundary should not be extended to incorporate this 12.5 hectare site. The site is very close to the Glen of the Downs nature reserve. It would be wise to try to protect this area and retain it as is.

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

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

The proposed road access from this site out onto Bellevue Hill seems to traverse a watercourse, known locally as Brown Trout Stream. Any road construction here would be at variance with the requirement (in our County Development Plan) for a core riparian buffer zone along watercourses to protect biodiversity and water quality. The tree and hedgerow cover on the lands provide for a natural wildlife corridor. Nature has become squeezed into ever smaller areas of land locally. I note the requirement for a Strategic Environmental assessment and this is essential given proximity to Glen of the Downs nature reserve.

I have looked at what is permitted by Active Open Space zoning in other areas and have seen that section 14.8.9 of the Dublin City Development plan states "In certain specific circumstances where it has been demonstrated to the satisfaction of the planning authority that there is a need for ancillary development to take place in order to consolidate or retain the sporting and amenity nature of Z9 lands or an existing facility in a local area, some limited degree of (residential/retail) development may be permitted on a once-off basis and subject to the primary use of the site being retained for sporting or amenity uses."

I view this zoning as a gateway to further change and development on Bellevue Hill in an area that is very sensitive environmentally. We have two relevant examples before us at present:

- Proposed material alteration no 31 proposes zoning for lands at Delgany Golf Club to special residential, allowing for 4 residential units.

- Proposed Material Alteration 30 suggests a change in zoning for a small part of Greystones Golf club from Active Open Space to residential.

I am concerned that proposed zoning on Bellevue Hill could have similar unintended consequences in opening up lands for further development in the future.

I am also concerned regarding equality of access to any proposed sports grounds at this location and would hope that sports facilities would remain accessible to families who need to rely on walking or public transport. The road network in the area is not suited to increased traffic volume. As a teacher in Bray I know how difficult it is for certain families to access Bray Emmets training facility given its location on the N11.

The wording of Specific Local Objective 12:

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

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

I welcome the statement that "existing hedgerows and wooded areas should be maintained in the development of this area, with minimal breaks to allow access through hedgerows" but it is rendered useless by including the phrase "Insofar as is possible,". Anyone who visits this site will see that the access to Bellevue Hill will only be enabled by cutting right through existing hedgerows and native wooded area.

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

Thank you for considering my submission.

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