



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

Who are you:	Private Individual
Name:	Debbie Jenkinson
Reference:	GDKLPF-145418
Submission Made	November 20, 2025 2:57 PM

## Topic

LAP - Proposed Material Amendments No 26 Submission

## Submission

To whom it may concern

I would like to object to the proposed development on these grounds:

- Ecologically Sensitive Corridor:

Bellevue forms one of the last intact ecological corridors linking Glen of the Downs SAC with Delgany, supporting high-value habitats and species.

- Protected Wildlife at Risk:

The area supports protected bats, owls, raptors, red squirrels, pine martens, badgers, hedgehogs, amphibians, and pollinators. Disturbance or development would cause displacement and long-term habitat loss.

- Severe Impact of Floodlighting:

- Artificial lighting reduces bat activity by 50–90%.

- Disrupts owls' hunting and breeding.

- Causes insect mortality and breaks nocturnal feeding cycles.
- Skyglow would negatively affect the adjacent SAC.

- Noise & Activity Disturbance:

Evening sports use introduces shouting, whistles, traffic, and crowd noise, all of which disrupt nocturnal species and alter natural behaviour patterns.

- Hydrological & Water Table Risks:

- Bellevue contains natural springs, seepage slopes, and seasonal wetlands.
- Levelling, drainage, and engineered surfaces risk altering the water table.
- Increased runoff could erode slopes and carry sediment into the Three Trout Stream.
- Hydrological disruption could negatively affect groundwater systems feeding the SAC and the glacial valley.

- Archaeological & Cultural Landscape Value:

Bellevue lies within a historically rich zone linked to Bronze Age ritual landscapes, early medieval Cuala, Viking Dyflinarskiri, and the La Touche heritage era. Fragmentation would permanently damage this cultural landscape.

- Landscape & Visual Character:

The land forms the rural buffer to Delgany, the natural dark-sky backdrop, and part of the glacial valley setting. AOS zoning would introduce urbanisation, lighting, and infrastructure incompatible with this landscape.

- Conflict with EU Law:

The rezoning contradicts obligations under the Habitats Directive, Birds Directive, Water Framework Directive, SEA/EIA Directives, the Aarhus Convention, and the EU Nature Restoration Law (2024).

These require the protection of ecological corridors, prevention of habitat deterioration, and safeguarding areas adjoining Natura 2000 sites.

- SLO 12 is Unworkable:

A surfaced trail “open at all times” would require lighting, increased public activity, and hedgerow breaks, leading to habitat fragmentation and disturbance incompatible with species protection and EU law.