



Draft Blessington Local Area Plan Submission - Report

Who are you:	Agent
Name:	Dunmoy Properties Ltd
Reference:	DBLESSLAP-212157
Submission Made	December 10, 2024 9:29 PM

File

Cover Letter and Planning Consultant Assessment of LAP 2024.pdf, 1.2MB

Appendix 1 - Blessington Zoning Presentation.pdf, 6.45MB

Appendix 2 - SITE LOCATION - MAP 1.pdf, 1.25MB

Appendix 3 - PROPOSED ZONING - MAP 2.pdf, 1.27MB

Appendix 4 - SCHEME LAYOUT - MAP 3.pdf, 2.8MB

Appendix 5 - Blessington WWTP Public Utility Zoning Assessment.pdf, 3.26MB

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Co. Wicklow. A63C966.

10th December 2024.

DRAFT BLESSINGTON LOCAL AREA PLAN 2025.

Dear Sir/Madam,

This planning commentary is submitted as part of a larger submission to the Draft Blessington Local Area Plan 2024. It is made on behalf of Dunmoy Properties Ltd., which is developing the lands owned by Dungrey Limited to the south of the town, on either side of the N81. The location of the subject lands and the proposals for the zoning and development of the lands are contained in the accompanying documentation. They are identified on Map 1 below.



Map 1 – LANDS in the OWNERSHIP of DUNMOY PROPERTIES, THE SUBJECT LANDS.

RATIONALE FOR THE PROPOSED SUBMISSION.

The land use zonings proposed in this submission are based on sound planning principles which, if implemented would allow for the granting of planning permissions which would further the proper planning and sustainable development of Blessington over the next few years.

Reference is made the national and ministerial planning guidelines: -

National Framework Plan.

The focus on the existing footprint of the built-up area, for residential development, derives from the National Planning Framework (NPF). Appendix 3 outlines a methodology for a tiered approach to land zoning. Tier 1 lands are those which are serviced and generally within the footprint of, or **spatially sequential within**, the identified settlement. Such lands will generally be positioned within the existing built-up footprint of a settlement or **be contiguous to existing developed lands**.

Development Plan- Guidelines for Planning Authorities 2022.

In the Guidelines the Tier 1 approach to residential zoning of lands focuses on those **that connect to existing services and are within the built-up area**.

Section 4.4.1. states that any analysis of residential zoned land and proposed number of housing units must have regard to any extant permissions for residential development. **The current and anticipated rate of housing delivery also needs to be considered.**

Where there is a surplus of well-located and fully serviced and land to meet population and housing targets, phasing should be based in factors such as site location, the availability or proximity of, or capacity to provide, off site services, facilities or infrastructure. This should also be viewed in the context of the urgent need to increase housing supply.

Phasing may not be necessary where serviced housing sites are of broadly equivalent merit for development purposes. In all cases, whether phasing is applied or not, development plans must build in sufficient flexibility to ensure that housing development not progressing on one, or more, sites cannot operate to prevent other suitable sites that may be developed within the life of the plan from coming forward.

Section 4.4.2.

Estimating requirements for land to be zoned for residential must follow on from an assessment of whether already zoned land is adequate to meet needs. **An important consideration in this regard is the rate of uptake and build out of such land in the preceding 6-10 years.**

Housing Supply Target Methodology for Development Plans 2020.

These Section 28 Guidelines, section 4.4., note that the Plan must ensure that there is sufficient provision for the delivery of housing to meet demand having regard to availability of services, **rate of uptake of development, pattern of housing completions, a realistic assessment of the likelihood of implementation of permissions must also be made.**

The above objectives are re-enforced in the recently published **Sustainable Residential Development & Compact Settlements Guidelines 2024**. These, also, promote a sequential approach to development with a focus on lands within settlement boundaries. In Section 3.3.1., for towns of approximately 5,000 population, priorities for residential development should

include: (e) the delivery of sustainable and compact urban growth expansion in locations close to the existing built-up footprint and (f) the delivery of sequential and sustainable urban expansion at suitable locations closest to the urban core and that can be integrated into the existing footprint.

The **County Development Plan** in Principle 4 refers to the sequential approach to development. Priority 4 of the principle deals with Tier 1 residential development. Such lands should be serviced zoned land that is 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 development lands.

Planning Basis for Residential Zoning.

The selection process, in the draft LAP, for the zoning of residential land is based on Principle 4 of the County Development Plan (CDP). The principle outlines 4 priorities: -

Priority 1 is given to infill development (town centre) and brownfield and derelict sites.

Priority 2 is given to strategic sites as identified in the RSES (Regional Strategy).

Priority 3 is given to infill sites within the CSO town boundary.

Priority 4 is given to greenfield sites to which a 2-tier approach is adopted distinguishing between serviced and serviceable sites.

This approach derives from NPO 72a of the National Planning Framework. This objective requires differentiation between land that is serviced and that which is serviceable. Objective 72c states that lands which cannot be serviced within the lifetime of the plan should not be zoned.

Paragraphs 6.3.2. and 6.3.4. of the CDP are also of note. 6.3.2. refers to the location of new residential development. Priority is given to the designation of the existing built-up area, with infill and back land development. Where insufficient land is available in the centre of a settlement new housing shall be permitted on greenfield sites, that are zoned. In turn, the zoning of greenfield land shall adhere to several principles, which include:

- The sequential approach extending outward from the centre **contiguous** to the existing built-up area.
- Undeveloped lands within 10 minutes' walk of a centre are prioritised.
- Lands already serviced or easily serviced will be prioritised.

6.3.4. phasing will be sequential from the centre, leap frogging to be avoided. Areas to be developed shall be contiguous to existing developed areas.

SUMMARY of GUIDELINES.

Those sites to be zoned for residential development should be within the built-up footprint **or contiguous to** or existing development in the town. The current and **anticipated role of housing** delivery should be considered in a decision to zone lands. Priority in phasing should be influenced by site location and the **availability or proximity to provide off site services, facilities and infrastructure**. Sites of equivalent merit to be zoned. Plans must build in **sufficient flexibility** to allow suitable sites, which may be developed, to **come forward during the lifetime of the plan**.

Map 1 of this submission shows the location of the subject lands within the settlement boundary of Blessington. It also shows that the lands are contiguous to existing residential development to the north (at the park and the Glen). The lands are located between Burgage Manor, to the east, and lands undergoing development to the west of Kilmalum Road. These lands, to the west of the road, are in the administrative area of Kildare County Council. They are zoned for residential purposes and a primary school, in the Development Plan 2023-29, Blessington Environs. These are not depicted in the proposed LAP land use zoning map. As a result, it appears that the subject lands are peripheral. However, in reality this is not the case.

Further to the above, it is noted that that existing NFP growth estimates and housing targets are under review. This is subsequent to the 2022 Census of Population. Revisions are expected in the near future. The existing NFP estimated the annual rate of population growth in the Country would be 0.9% per annum. The Census indicated that the growth rate was actually 1.3% p.a., with Wicklow growing at 1.5% p.a. Provision will also have to be made for pent up demand which has grown considerably over the last few years as access to the housing market has proved impossible for large numbers of people. This has been heavily influenced by lack of supply.

Comparison of the target for housing stock in the CDP 2016-22 and the actual number of dwellings identified in the Census reveals a shortfall in provision of c.10,000 dwellings in the County. Appendix 3, Section 2.2. of the CDP 2022-28, notes that the growth targets in the Plan are likely to be reviewed/ revised well before 2028. There is clearly an urgent need to facilitate the development of lands that will increase housing supply in the short term. This is highlighted in section 1.3.5. of the Development Plan Guidelines 2022. In the identification and zoning of lands for new housing, priority should be focused on lands that can most quickly and appropriately provide new houses. Longer term development areas can also be facilitated, for development in the future.

PROPOSED ZONING SUBMISSION.

It is subsequent to the above that this submission is made to the draft LAP. The proposed re-zoning of lands (identified on Map 2) constitutes a range of uses that will fulfil several key objectives of the National Planning Policies and Guidelines. It will also address many of the issues identified in the issues paper, published by the planning authority in preparation of the draft Plan.

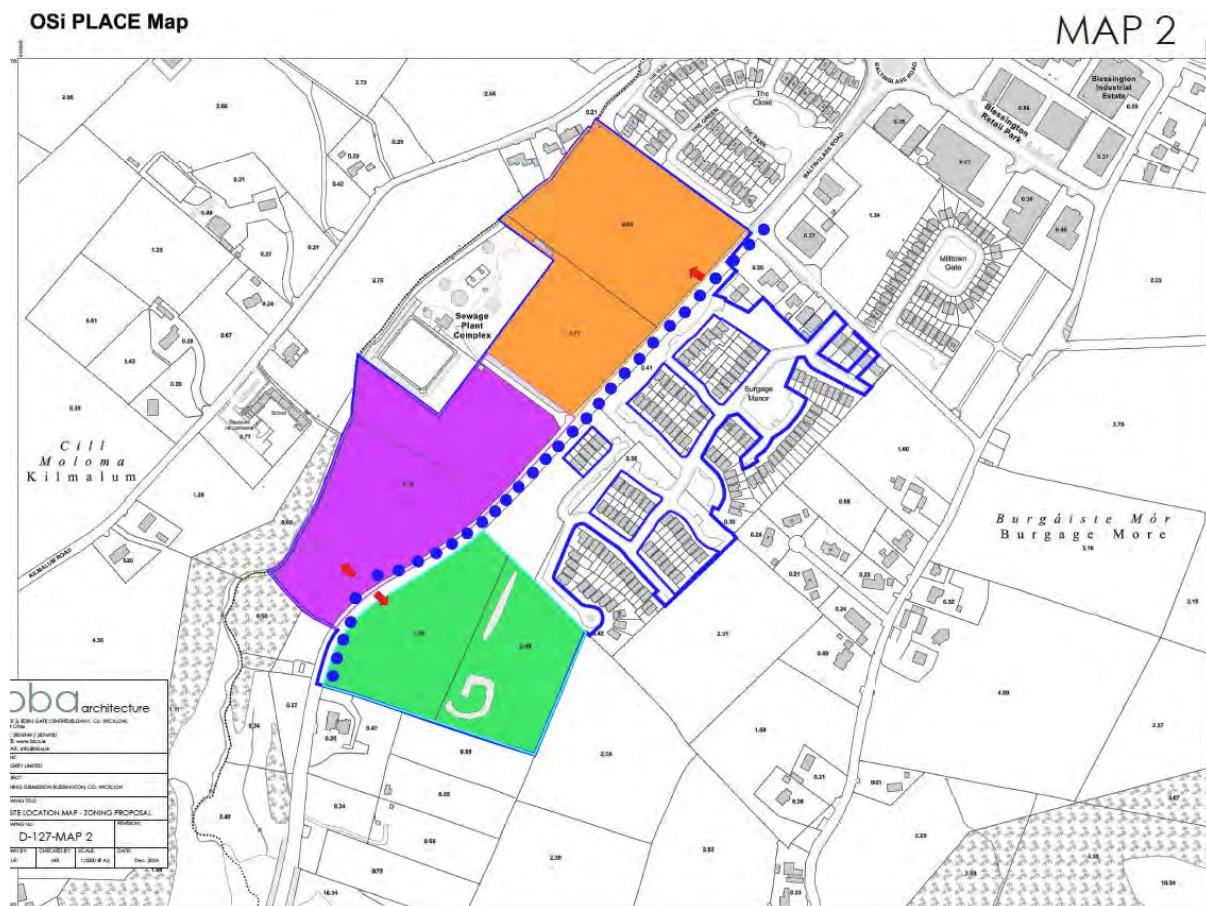
This submission seeks the zoning of the subject lands for residential on site 1, which is 4.4 hectares in area, employment on site 2, 4.5 hectares in area and active open space on site 3, 3.7 hectares in area.

It is considered that the subject site 1 meets all of the above criteria for the land to be zoned for residential development.

Consequent to the above a review of the proposed draft plan land use zoning map raises several anomalies. There are 3 sites zoned RN1 (1st phase). There are 5 zoned RN2 (2nd phase). Three of the latter are subject to specific local objectives (SLO 1, 5 and 7).

SLO1 has not been the subject of any planning applications. At its closest it is c. 1000 metres walking distance from the town centre. Development is reliant on a road's objective, which must be delivered "in full" prior to any residential development. Equally, the development of a 4-hectare open space must be in use prior to the granting of permission for any residential development.

SLO 5 is also approximately 1000m from the centre and SLO 7 1500 m from same.



Map 2 - PROPOSED LAND USE ZONING for THE SUBJECT SITES.

The other two RN2 sites are to the north of the town centre and are small in area. it is noted that An Bord Pleanála refused permission on the larger one last year for a variety of reasons. These included prematurity pending the provision of the inner relief road.

The other site earmarked for residential development is Dorans's pit, a large quarry. Being proximate to the town centre the site, in theory, presents a good opportunity for residential development. However, reality presents the opposite. The site requires extensive remediation. A new link road is required, and a sports ground is to be developed before any residences can be occupied. It is the case that such a site does not present any appeal for a potential developer. It is very likely that development of the site, if ever, will be beyond the lifetime of the draft plan, once adopted.

In addition to the above, the Council is also referred to the detailed assessment of the overall characteristics of the RN2 zoned sites which is contained in the presentation by Dunmoy Properties, as part of this submission.

Given the above, the zoning proposals contained in this submission (outlined in Map3) appear very acceptable. More importantly, they are realistic and can be delivered in the short to medium term. Dunmoy Properties Ltd, have been and are actively engaged in the delivery of residential developments in Blessington. Approximately 150 much needed dwellings can be provided in the

near future- on a serviced site, within walking distance of the town centre. A site that is both contiguous to existing development and constitutes a form of infill between existing development to the east and that planned to the west in Kildare.

The residential development of the 4 hectares is part of coherent proposal that includes employment, active open space and the surface car park (identified in Map 5 of the draft plan). The employment lands are well situated with good access to the road network. This suits the type of employment on the site which is not commuter orientated but relies on access that does not impinge on traffic in the town. To the other side of the N81 playing pitches, lacking to the south of the town, are provided. These will be grassed so as not to require floodlighting which could impact on the ecology of the Reservoir.

The development of the subject sites would bring with it much needed improvements to the N81. Designed by POGA Consulting Engineers, these are detailed in the Dunmoy Properties presentation in this submission and have also been discussed with Wicklow County Council in advance. (On 31st October 2023 Dunmoy Properties, along with our Architects from BBA and Engineers from POGA, had a Teams call with the WCC Road Engineers, John Bowes (Snr Engineer, Transport & Roads), Brendan Doyle (Project Liaison Officer for Transport & Roads) and Patrick Byrne (District Engineer, Baltinglass Municipal District). The WCC team were broadly supportive of the proposal as presented by Dunmoy Properties and as outlined in the presentation that accompanies this document.

These improvements will provide an upgrade to the existing access to the south of the town. Traffic safety for motorists, cyclists and pedestrians will be greatly enhanced. The opportunity for safe access to lands on either side will facilitate the provision of employment, community and sports facilities. In addition, the re-zoning of c.4.4 hectares of land for residential purposes will make viable the delivery of the improvements to the N81. Houses can be readily delivered in a sustainable and suitable location, adjoining existing residences and supporting recreational and community facilities to be provided. The location of the residences will help balance growth in the town, which is currently focused to the north and west. The volume of dwellings possible is not considered to have any material impact on the target of housing units for Blessington, which will be revised in the near future.

Provision is also made in the submission to re-zone c.4.5 hectares of land to the west of the N81 for employment purposes. These lands are at the entrance to the town and will benefit from good access, off the improved road. This location for the employment lands is considered to be better than that proposed in the draft plan. This site is considered to be much more suited to residential development given its location amidst existing and proposed dwellings. It will consolidate same, as a form of infill development. This land is also perfectly placed with the new access for a community parking facility should that be required.

Finally, c.3.7 hectares of land, to the east of the N81 and south of Burgage Manor, are proposed to be re-zoned for open space, sports and recreation.

DRAFT PLAN PROPOSALS.

Clearly, the proposals in the draft plan do not accord with the above. It is considered that they are based on a myopic interpretation of Government and Ministerial Guidelines. Critically, the plan fails to account for the shortcomings of the sites that are proposed for zoning. Shortcomings which will impact negatively on delivery- an issue considered to be critical in section 4.4.1. of the Development Plan Guidelines 2022 and the Housing Supply Target Methodology 2020.

The draft Plan proposes to zone the lands in front of the existing treatment plant as “public utility”. It is assumed this is to allow for the future expansion of the facility, at some point in the future. However, this “need” is mis-informed. The capacity of the existing plant can be expanded to a population equivalent of 15,000 people within the existing plant site area. There is no need to reserve lands for such an expansion. Blessington will never grow to such a level that will warrant such a level of expansion. In this regard, the Council is urged to confirm with Irish Water that the capacity of the plant can be substantially increased (from the current 9000 PE capacity) without the need to expand the size of the existing site. The report by Barret Mahoney, Consulting Engineers, submitted as part of this submission, is noted in this regard and in particular the comments within from the Engineer that operates the Blessington Wastewater Treatment Plant and knows it better than anyone.

The concept of RN2 residential lands is “to ensure long term supply of zoned land in part to ensure flexibility in the event of an increase in housing targets”.

SUMMARY.

Subsequent to the above, it is considered that most, if not all, the proposed residential lands in the draft plan are subject to shortcomings. These include location, infrastructural issues with the timely provision of services or roads and lack of delivery represented with either lack of any planning activity or planning problems associated with recent applications. Such shortcomings will hamper the delivery of much needed housing in the short term. The lands, subject of this submission, are owned by Dunmoy Properties Ltd. A company which is currently developing lands in Blessington for residential purposes.

The subject lands are as well, if not better, located, as the others, within the town to be zoned for residential development. Such a zoning is fully consistent with the “selection criteria” in the Government and Ministerial Guidelines, referenced above. They are serviced, contiguous to other residential developments and represent infill development (compliant with Priority 3 of the Development Plan). In this regard, the location of the lands is not in the town centre, so Priority 1 does not apply. Equally, there are no strategic sites in Blessington identified in the RSES. Again, this priority does not apply. The next relevant Priority does apply having regard to location and the fact that the lands are serviced. It is considered that the case to have the lands zoned residential is overwhelming.

As a result, the need for employment and parking provision in this part of the town can be better met on the lands indicated on Map 3 of this report. This location is much more accessible and suitable for the location of the type of employment uses that will be provided on the site. The car park, proposed in the Draft, is catered for and strategic and safety upgrade to the N81 delivered.

Consequently, the submission is considered to propose a well-considered and integrated package which will benefit the south of the town. The re-zoning of the lands, as proposed, will promote residential development in the short term, will provide for employment and recreational/

sporting facilities and upgrade the N81 with substantial improvements in access and safety for all users. It is recommended that the proposals be favourably considered and included in revision to the Local Area Plan.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Colin McGill', is positioned below the closing of the letter.

Colin McGill. B.A.(Hons), M.Sc. MRTPI.

Chartered Town Planner.



DUNMOY

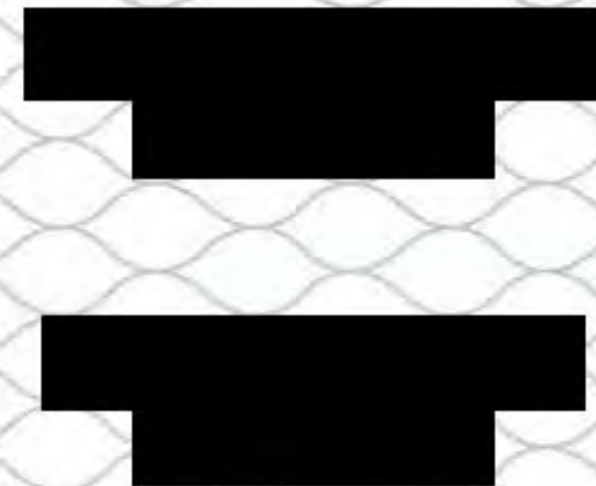
PROPERTIES LIMITED

Proposed Land Use Change to Lands to the South of Blessington

Draft Local Area Plan - Submission 11 December 2024

www.dunmoy.ie

Burgage Lands - Land Zoning 2013-2019





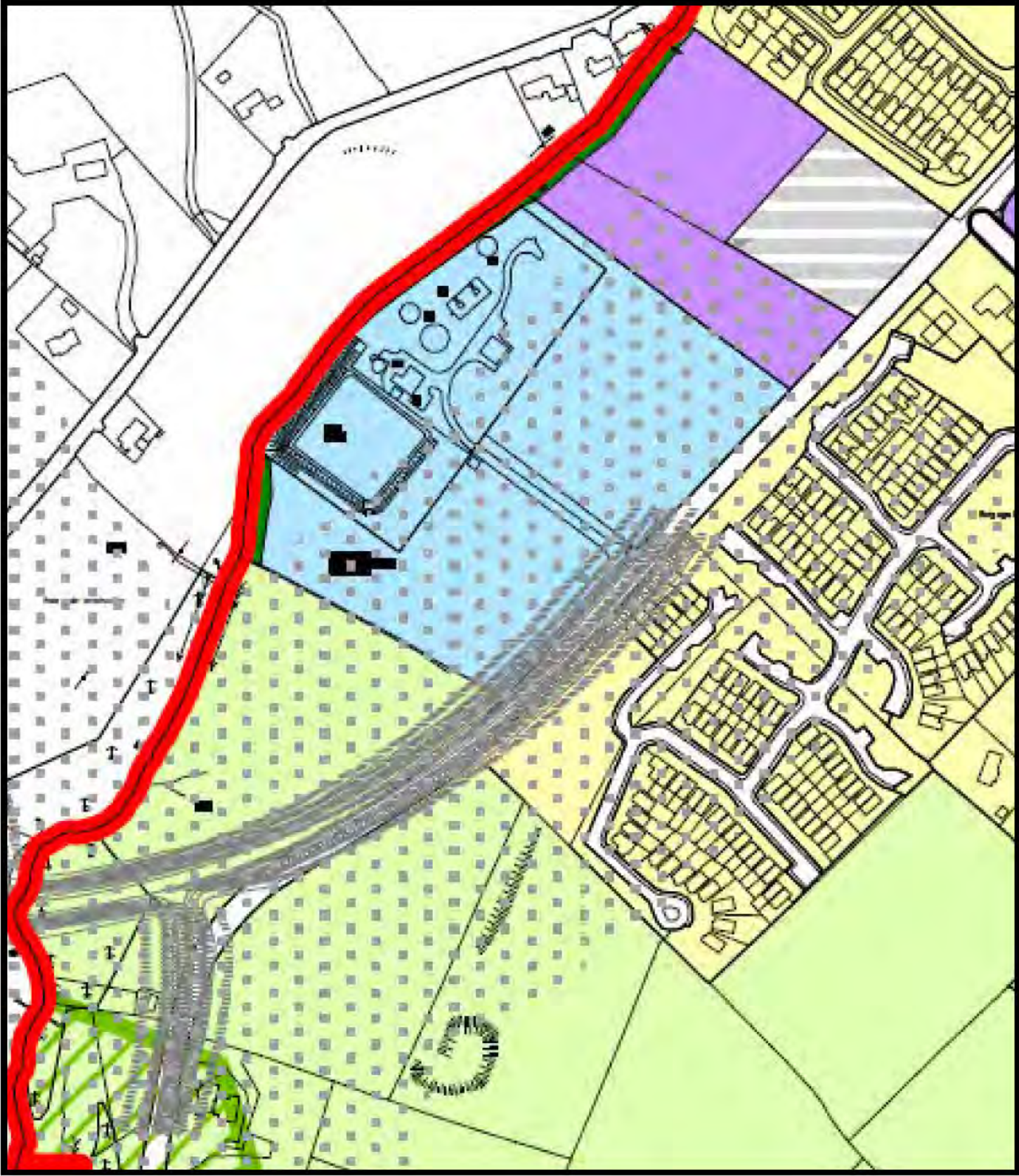
Dunmoy - Burgage Lands

Dunmoy controlled lands in Blessington (Folio WW1752F) is shown here. These lands are to the South of the town and are on both sides of the N81.

These lands, totalling 17.03 Hectares, are held by a company called Dungrey Limited but for the purposes of this document we will refer to them as the Dunmoy Lands. These lands are currently zoned “Existing Residential”, “Employment”, “Park and Ride”, “Community & Institutional”, and “Agricultural”.

We believe that Dunmoys’ strategic land holding offers exceptional potential in the new Local Area Plan to address much needed housing, provides employment and support new community infrastructure and open space to benefit the entire community, furthermore, it also assists in delivering a safer, more pedestrian and cycle friendly, N81 as it enters Blessington at the South of the town.

Current Zoning - Blessington Local Area Plan 2013-2019



Employment/Proposed Employment



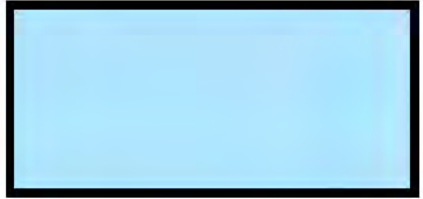
2.0 Hectares

Park & Ride Lands



0.7 Hectares

Community, Educational & Institutional



4.0 Hectares

Existing Residential



3.74 Hectares built
0.69 Hectares SPP

Agricultural Lands



5.9 Hectares

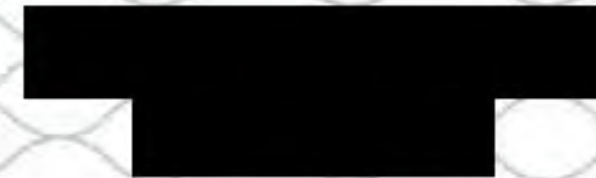
Current Zoning

- ✓ **Park and Ride:** We understand this was proposed at this location in conjunction with the proposed N81 Bypass/Outer ring road works and in supporting a high-quality bus corridor. With this not currently in any future plans, this land use is no longer appropriate at this location and as it is fully serviced, this land has greater potential for other uses.
- ✓ **Community, Institutional & Educational:** We have contacted the Department of Education, to be told that whilst there is a need for an additional school in the area, a location has been chosen. Expansion to the Water Treatment works has been completed within the existing footprint and takes capacity to 9,000 population. We explored use for a Gym/Swimming Pool but regrettably this was not commercially viable.
- ✓ **Employment Zoning:** The current area zoned Employment is high-value serviced land, with a small section, along the stream, impacted by Uisce Eireann infrastructure. This strip of land could serve as Open Space in a residential development. With the existing Employment Use location, this area is more suited to office use, with parking nearest the stream. However, the Issues Paper focused more on Product based industries and therefore more Industrial styled units. As such this current zoning location is not ideal for the industrial units that are envisaged. We, therefore, propose to move this Employment zoning to the south, to have a larger more contiguous area, more viable commercially for Industrial style units and in a location that is less visually impacting to the homes that surround this land on 3 sides.
- ✓ The **Agricultural lands** are suitable primarily for rough grazing with a number of gravel piles and pits. These lands, in the section nearest the N81 to the southeast, have a steep gradient making them unsuitable for development. We believe these lands could better benefit the community as community sporting lands and open space. Using the steeper lands for an access road and parking facilities and the flatter lands overlooking the lake for 2 new sports pitches.

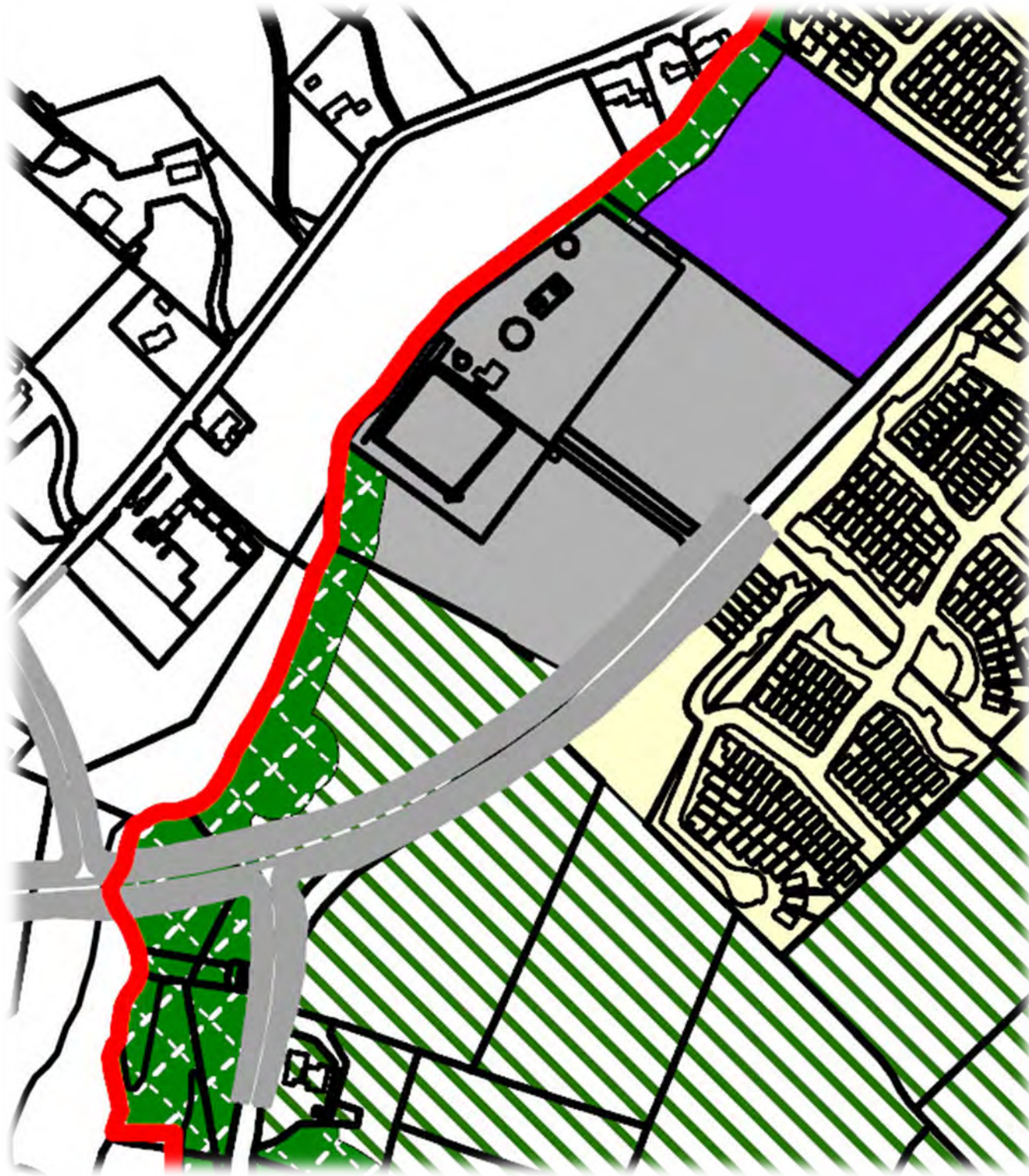


Wicklow County Council: Blessington Draft LAP

Issued 30 October 2024 re. Dunmoy Lands





Blessington Draft Local Area Plan – Map No.1 Land Use Zoning



 E - Employment

 PU - Public Utility

 OS2 - Natural Areas

 AG - Agriculture

Preferred Route Alignment N81

Tallaght to Hollywood Cross Road
Improvement Scheme

Blessington Draft Local Area Plan – Map No.3 Key Green Infrastructure






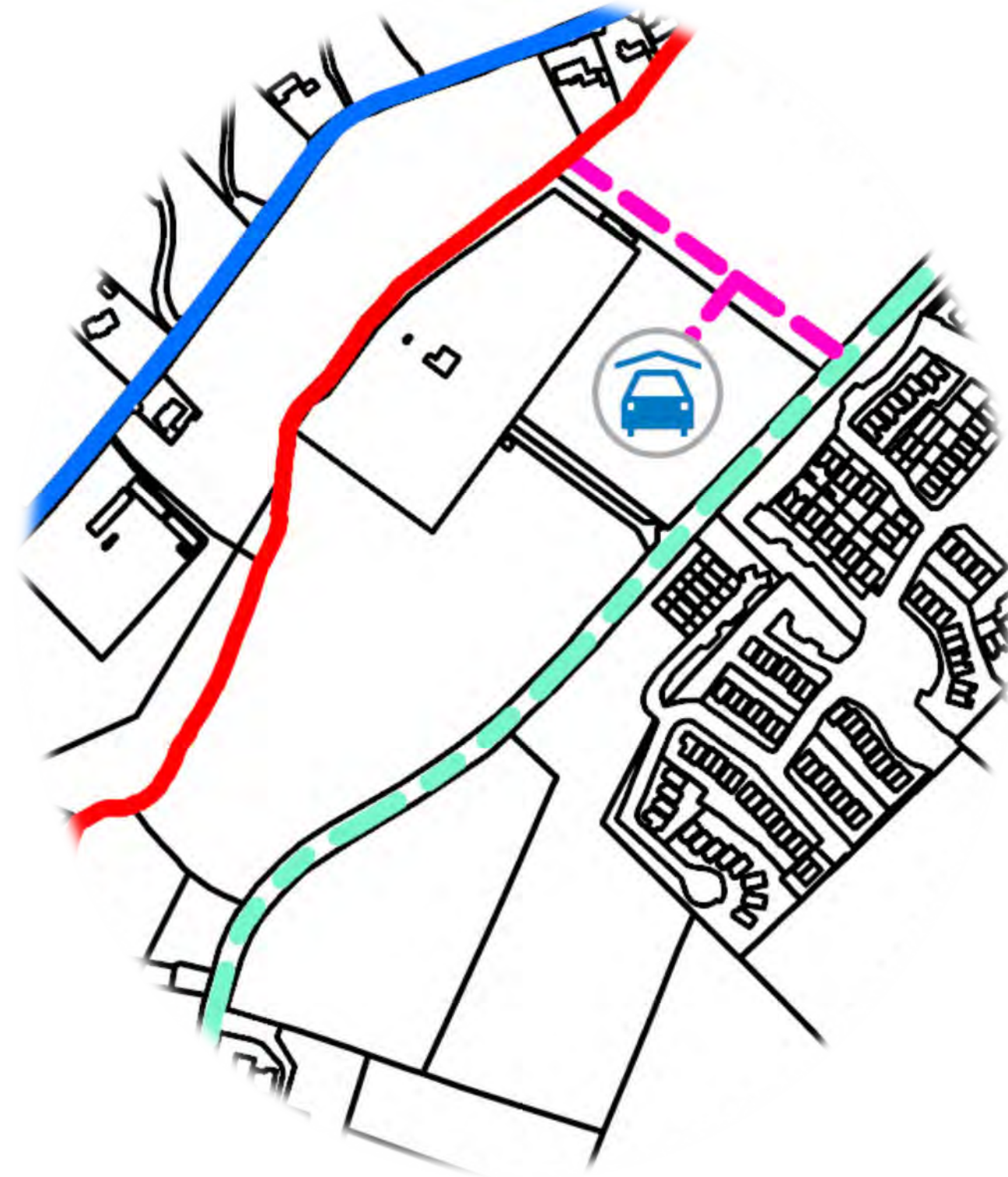
Green Corridors



Local Biodiversity Areas

Blessington Draft Local Area Plan – Map No.6 Active Travel Strategy

-  **Local Greenway Feeder**
-  **Indicative Pedestrian/Cyclist Routes (Greenfield/Brownfield)**
-  **Potential Car Park locations**



Population & Housing Objectives Draft LAP

- ✓ To adhere to the objectives of the Wicklow County Development Plan in regard to population and housing as are applicable to Blessington and ensure that the provisions of the plan creates a flexible land use framework that allows for housing targets to be fulfilled.
- ✓ A minimum of 30% of the targeted housing growth shall be directed into the existing built up area of the settlement, on lands zoned 'town centre', 'existing residential' and 'mixed use'. In cognisance that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this plan or the associated tables on the number of units that may be delivered within the built up envelope of the town.
- ✓ In order to ensure however that overall housing and population targets can be delivered, land may be zoned for new residential development outside of the existing built up envelope, subject to the amount of zoned land not exceeding 70% of the total housing target for that settlement.
- ✓ To require that new residential development represents an efficient use of land and achieves the highest density possible, subject to the reasonable protection of existing residential amenities and the established character of existing settlements.
- ✓ To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors in the town centre for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish;
- ✓ Housing occupancy controls: As a 'self-sustaining growth town', Blessington should provide for the housing demands generated from people from across the County and region.

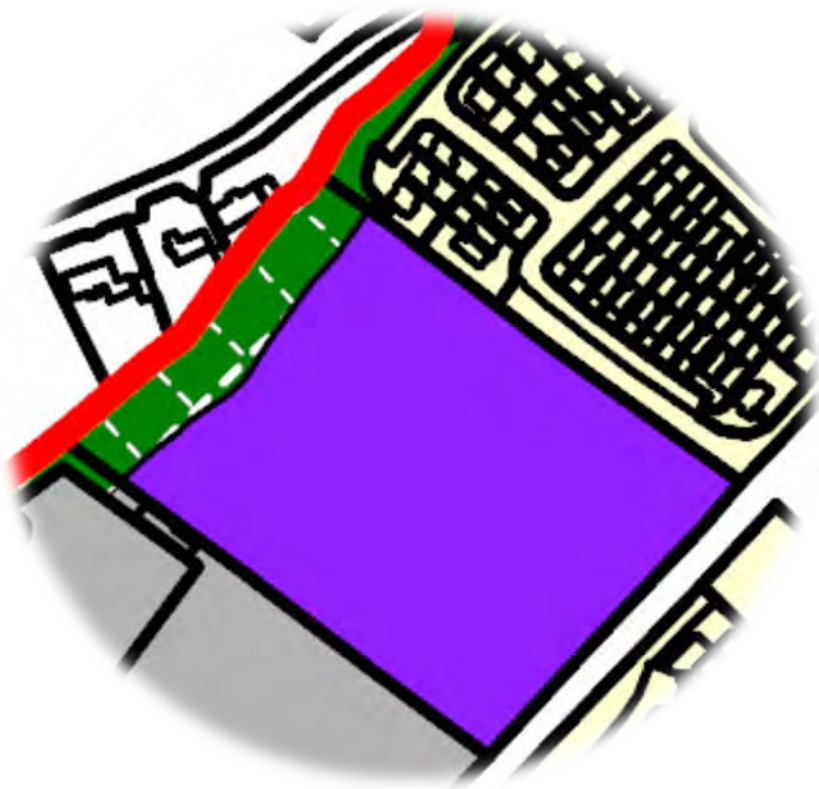


Blessington Local Area Draft Plan – Zoning for Residential Development



- It is an aim of this Draft plan to focus new residential development into the **serviced existing built envelope of the settlement**. The 'Town Centre' (TC) zone and the 'Existing Residential' (RE) zones all present significant housing opportunities through **densification of the existing built-up area**, re-use of derelict or brownfield sites, **infill** and backland development. In any development proposal for this area, particular cognisance must be taken of the need to respect the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within the settlement. These central areas may not be sufficient in size and scope to accommodate all of the required long term future housing growth, therefore **new 'greenfield' housing development shall also be considered**.
- 'Edge of centre' locations will be considered the priority location for such new greenfield residential development and will generally be zoned as 'New Residential - Priority 1' (zoned RN1) while more **'out of centre' housing sites (zoned 'New Residential - Priority 2' RN2) will only be considered where Objective BLESS7 is satisfied and on the basis of integrated housing / community facilities / open space schemes that can be well connected to the existing built up area**.
- In order to be cognisant of extant permissions and/or the key role that some sites will play in the delivery of essential infrastructure, it may be necessary for some 'out-of-centre' sites to remain as Priority 1.

Blessington Local Area Draft Plan – Zoning for Employment



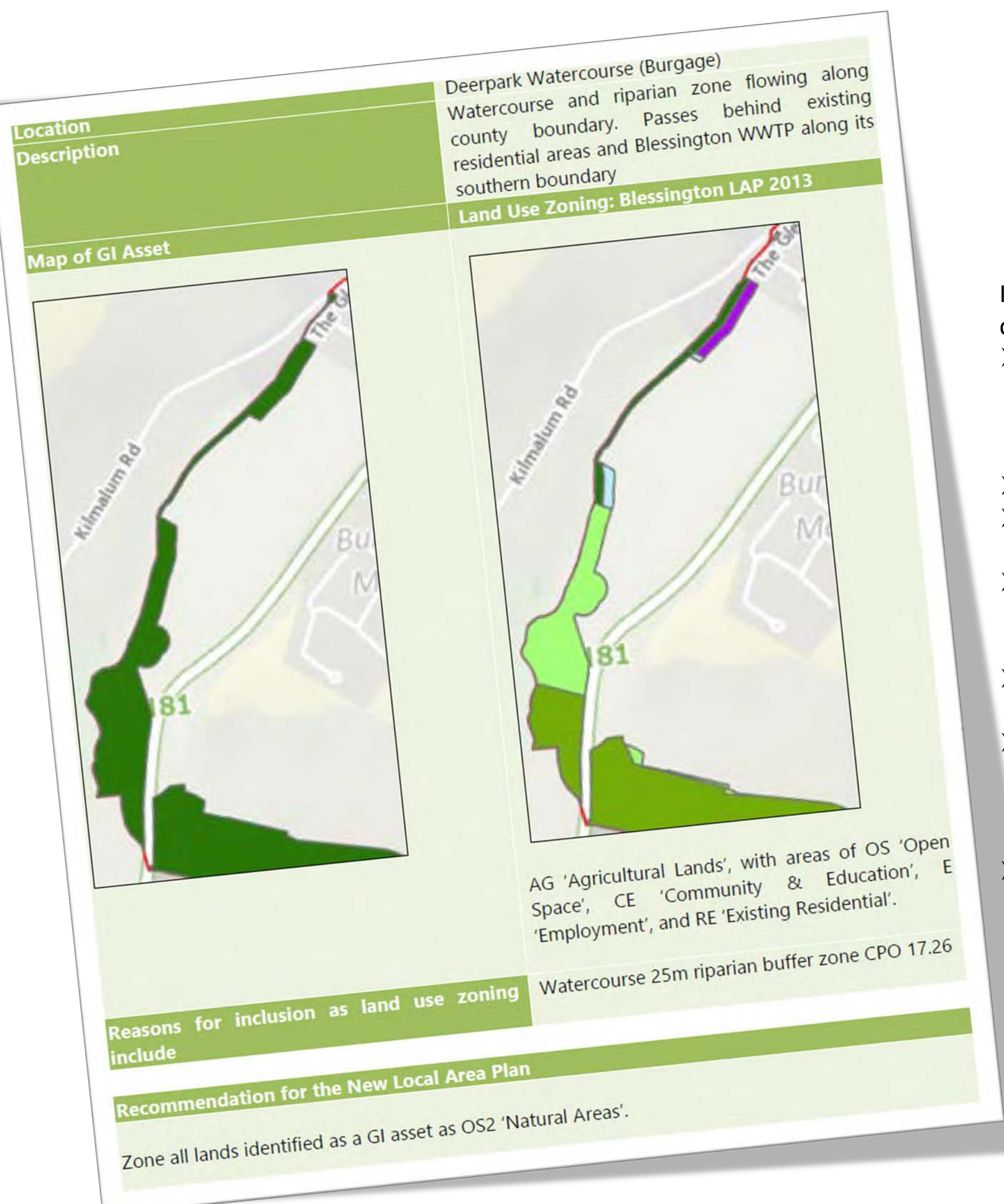
EMPLOYMENT OBJECTIVES	
BLESS8	To facilitate and support all forms of employment creation on appropriately zoned land in Blessington and to promote the intensification of activities on existing employment sites.
BLESS9	To protect employment zoned land from inappropriate development that would undermine future economic activity or the sustainable development of such areas.
BLESS10	To facilitate and support the development of large-scale employment generating developments in Blessington, as the only settlement in West Wicklow designated for strategic employment development.
BLESS11	To facilitate and support Blessington Town Centre as the priority for ‘people’-based employment development, in line with the Core Retail Area as set out in the Wicklow County Development Plan.
BLESS12	To facilitate and support the regeneration of current and former quarry lands for employment uses, as zoned for such purposes. The redevelopment of these lands would be suitable for a single large-scale employer or for a wide variety of individual ‘people’- or ‘product’-based industries operating within an overall integrated layout within the lands.
BLESS13	To encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the plan area and to consider allowing ‘relaxation’ in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided. For the avoidance of doubt, the redevelopment of quarry lands for employment purposes should not generally require the relaxation of standards due to the scale of employment lands in this area.
BLESS14	To facilitate and support the incremental reconfiguration of Blessington Business Park/Oak Drive toward a secondary ‘people’-based employment area with a high-quality public realm, active frontages, and safe active travel accessibility. New applications for employment developments will be considered subject to the inclusion of proposals for the above public realm improvements. New applications for developments deemed to be ‘product’-based, or applications concerning existing developments of that type, will be further required to demonstrate that HGV traffic sufficient to create a hazard to active travel users within and around a subject site would not be generated.
BLESS15	To facilitate and encourage the exploration and exploitation of aggregates and minerals, 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 relating to the Extractive Industry in Chapter 9 of the Wicklow County Development Plan 2022-2028.

Blessington Local Area Draft Plan –

Zoning for Natural Areas

It is proposed to transpose GI green corridor assets as necessary into land use zoning objectives utilising the following approach:

- **25m riparian buffer zones** on both sides of a watercourse, where largely undeveloped, will generally be specifically protected via an appropriate ‘open space’ land use zoning objective, as per CPO 17.26 of the Wicklow County Development Plan 2022-2028.
- Defined European, or other, protected sites will not be zoned
- Necessary buffers around defined European, or other, protected sites, will generally be protected via an appropriate ‘open space’ land use zoning objective.
- Significant areas of existing woodland/forestry will, where deemed necessary, generally be protected via an appropriate ‘open space’ land use zoning objective, as per CPO 17.18-17.23 of the Wicklow County Development Plan 2022-2028.
- Hedgerows and linear tree stands will generally not be protected via land use zoning objectives but will rather be protected via the development management process.
- GI assets that form part of existing permitted open spaces, e.g. the permitted public open space for a residential development that would usually be zoned RE ‘Existing Residential’ in previous local area plans, will generally be specifically protected via an appropriate ‘open space’ land use zoning objective.
- GI assets that form part of other existing permitted developments, will be included or excluded as land use zoning objectives on a case-by-case basis. Where not included, they can be protected as needed through the development management process.



Blessington Local Area Draft Plan – Transport Assessment

Commuter parking:

Noting that long term commuter parking is an issue along Blessington Main Street and Market Square, and that car parking in these areas was not recorded as reaching saturation in these areas, the provision of a park and ride elsewhere for those wishing to transfer to public transport would free up many spaces and also reduce the effect of the reconfiguration of any such parking.

The Blessington Local Area Plan 2013 included an area of c. 0.75 ha for this purpose to the south of the town. **It is proposed to retain the concept but to reconfigure the zoning in this area such that the land reserved for future park and ride is located immediately east of the WWTP, potentially a less developable site for other uses, such as residential use given proximity to the utility installation.**



BLESS48

Support the development of additional car parking areas within the plan area, including but not limited to:

- A public transport park and ride in Blessington along the N81.
- A car park in Doran's Pit for potential greenway parking and access to adjacent woodland.
- A car park on Active Open Space lands in Blessington Demesne to serve those lands and as an alternative car park for access to Glen Ding.



Figure 56: P&R land use zoning objective under the Blessington Local Area Plan 2013.

Blessington Local Area Draft Plan – Transport Assessment contd

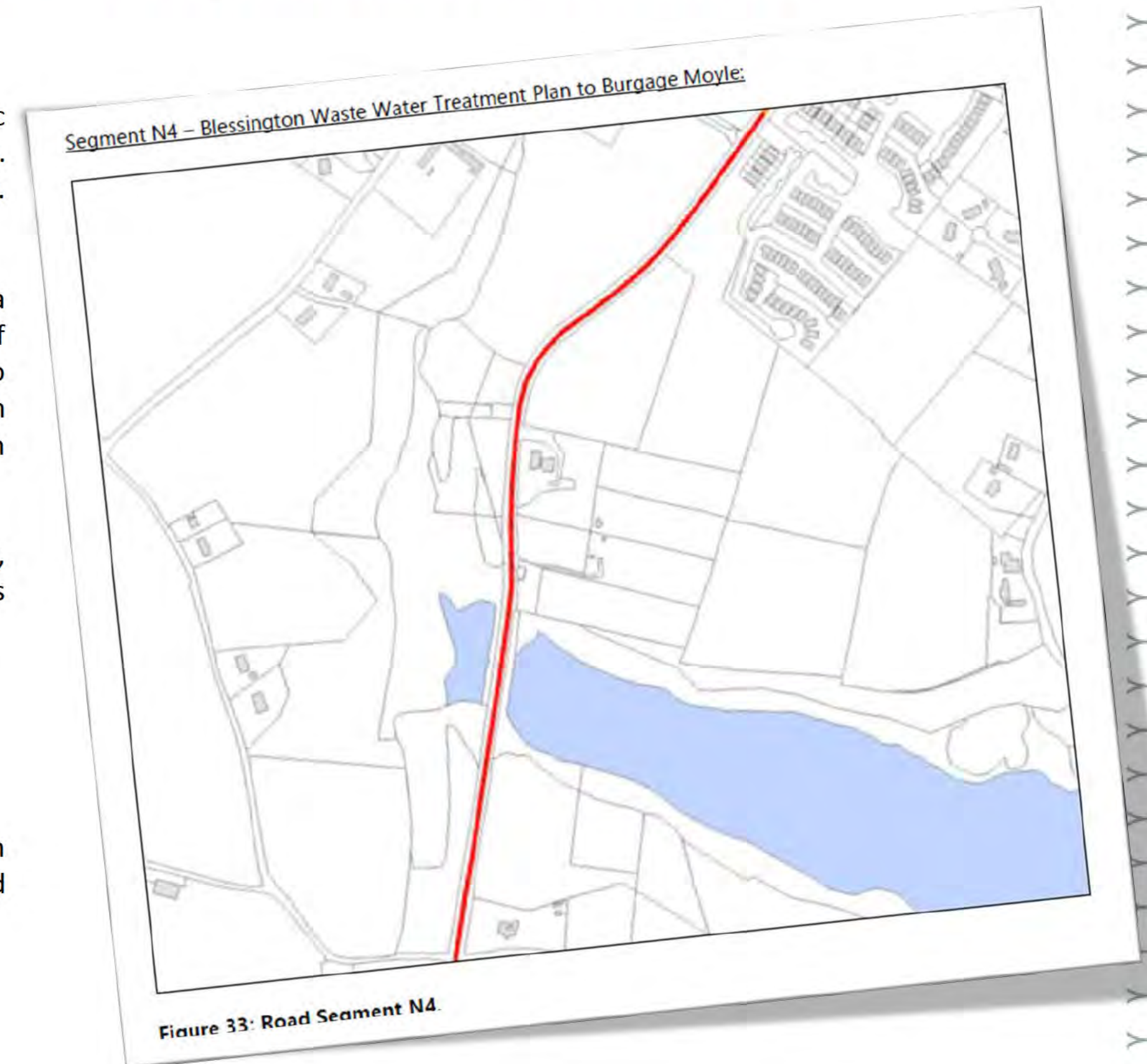
This road segment has a generous width, however it has poor alignment. Vehicular traffic at 100km/hr must traverse a significant bend, known as Nolan's Bend, along this segment. The straightening or bypassing of this bend could improve road safety along this segment. Footpaths and cycle infrastructure are generally not provided along this segment.

However, a short section of the Blessington Greenway travels along this road segment on a pathway where it crosses a bridge over the Poulaphouca Reservoir. Though this section of the greenway is segregated, it is likely uncomfortable for users to be in such proximity to 100km/hr traffic. This road segment is currently the main arterial route to Dublin from settlements south along the N81, a situation which will be unchanged by the completion of the Blessington Inner Relief Road.

However, the completion of the N81 bypass, from a point just south of this segment, would reduce through-traffic along this route. Were lands to be developed along this segment, the road could be given a more urban character that could have a further traffic calming effect.

Recommendations for Segment N4:

- **Improve the alignment along Nolan's Bend**
- **Provide pedestrian and cycle infrastructure**
- **Reconfigure this road segment to that which is more urban in character** upon completion of the N81 bypass as relevant, whether through the reallocation of road space or other measures.



Dunmoy Proposal

[REDACTED]

[REDACTED]

Dunmoy Proposed Zoning

✓ **Identifying Land Use.** In compiling this proposal, we have undertaken several Ground Investigation works to identify ground and soil conditions, topology and all existing infrastructure, including via the use of a Ground Penetrating Radar on part of the lands. This has enabled us to put forward a clear and deliverable proposal identifying zonings that work now and can be actioned upon; proposing access points that provide multiple benefits for use on what would otherwise be sanitized lands, due to existing underground infrastructure.



Employment/Proposed
Employment



4.03 Hectares

New Residential – R1



4.36 Hectares

Open Space



3.78 Hectares



Residential Zoning Proposal

This map shows the location of the subject lands within the settlement boundary of Blessington. It also shows that the development of our northern parcel of lands would constitute infill development.

The lands are located between Burgage Manor, to the east, and lands undergoing development to the west, on the Kilmalum Road. These lands are in the administrative area of Kildare County Council. They are zoned for residential purposes and a primary school, in the Development Plan 2023-29, Blessington Environs.

The subject lands we propose for New Residential are fully serviced and are a prime candidate for residential development to the south of Blessington town.

Our proposed road realignment will allow safe access to these lands from a roundabout on the N81, in addition to improving the N81 for all road users.

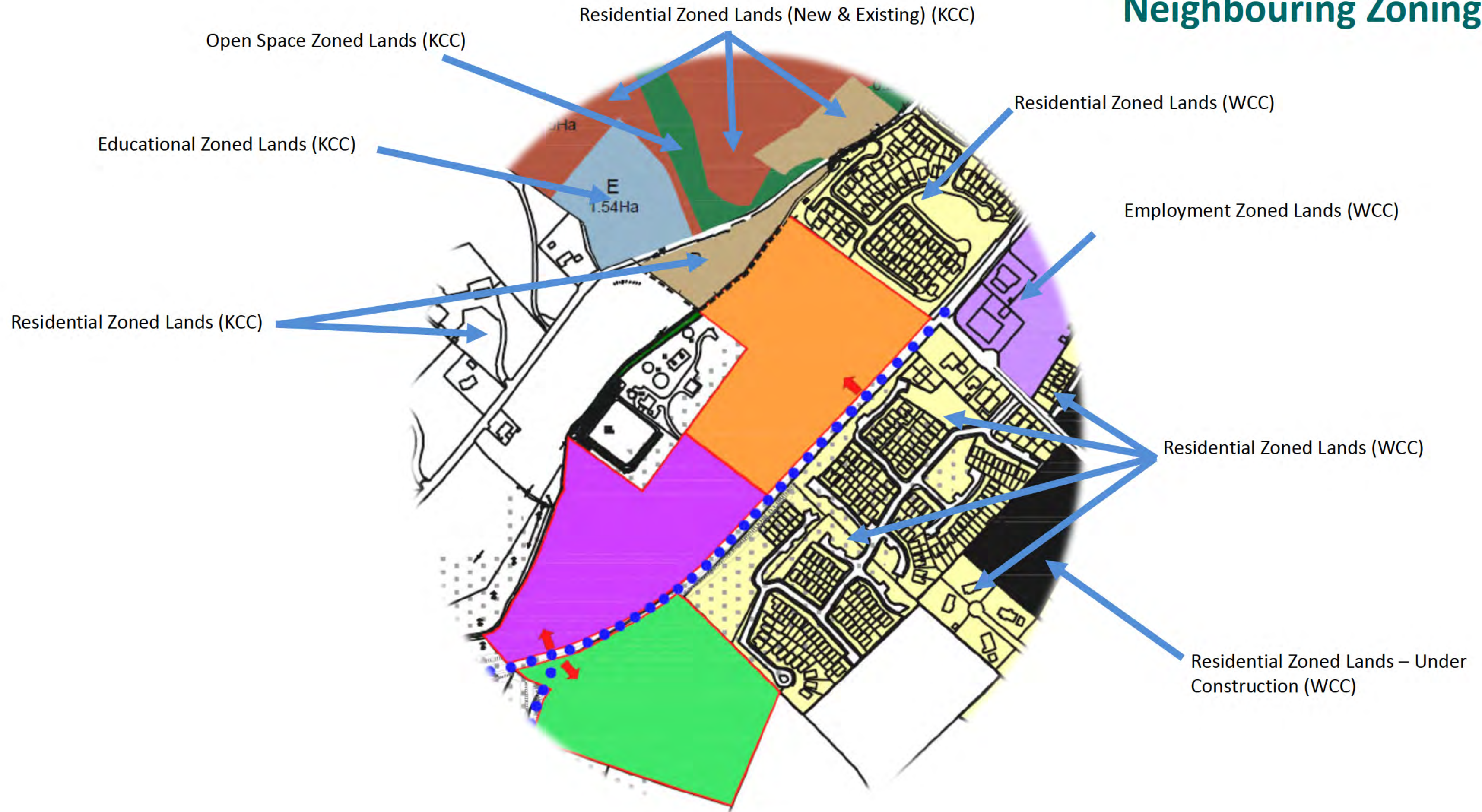
Employment Zoning Proposal

Our lands currently have zoning for c.2.7 Hectares of Employment and Park & Ride use. We are proposing to move the Employment zoned lands to the south and increase the area zoned employment to c.4.03 hectares. Our proposed road realignment will further allow safe access to these lands from a southern “Welcome to Blessington” roundabout on the N81.

Open Space Zoning Proposal

We propose these remaining lands, currently zoned agricultural, to be re-zoned to Active Open Space. We propose the eastern section, given the gradient, house 1 standard pitch and the western section 2x5/7 a-side size pitches (football/rugby) with Club house and parking access provided, as permitted within the Open Space uses. Access to these lands will be from the proposed new roundabout at this location.

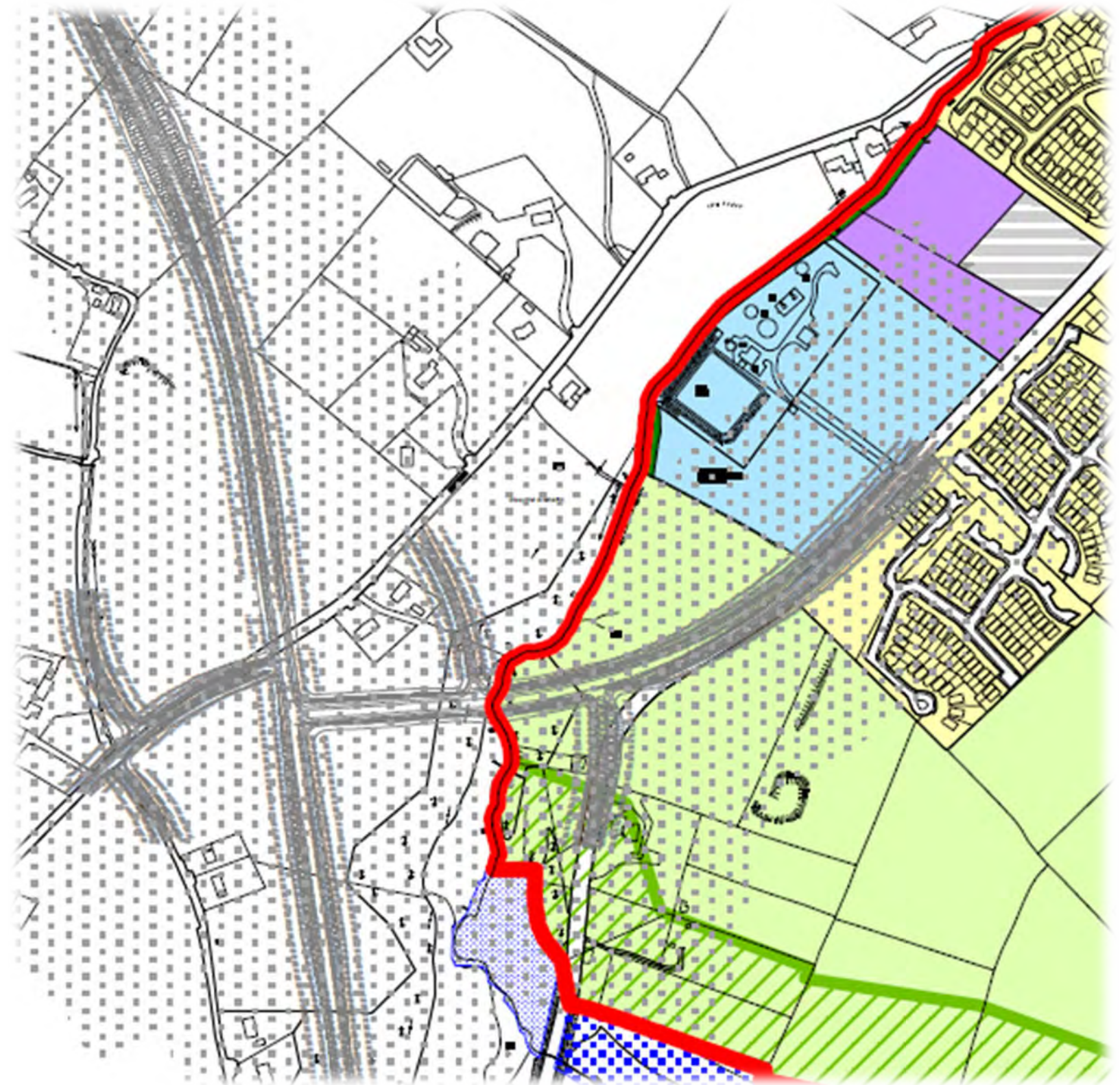
We have engaged with the representative of a joint sporting clubs submission relating to this Local Area Plan. They were supportive of our proposal, and the location of the proposed pitches. We will be happy to continue discussions with these two clubs subject to the outcome of this LAP review.



Infrastructure - New Road Proposal

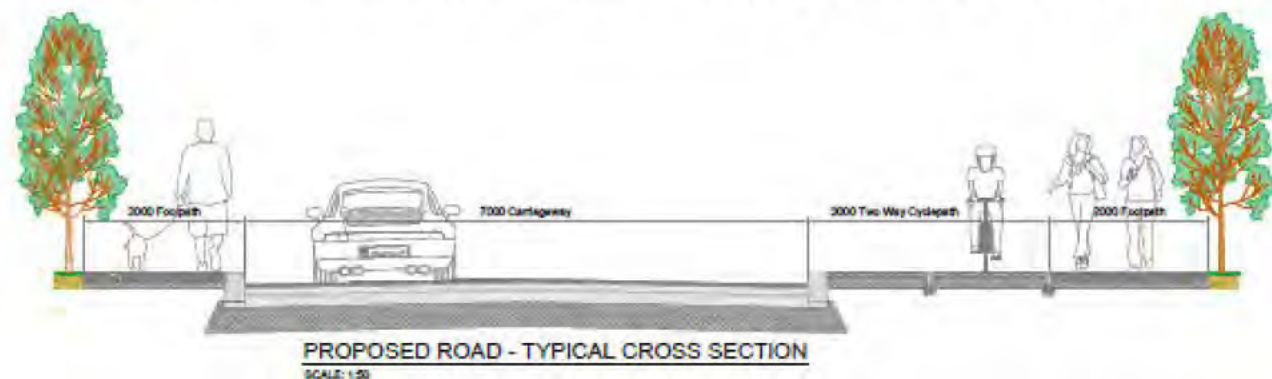
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- One key area of concern for local residents is the safety of the N81 for pedestrians and other road users, specifically the speed of vehicles as they enter Blessington from the South and secondly the series of dangerous corners known as Nolands Bends. There is currently no footpath or cycle path along this stretch of the N81 meaning there is no safe pedestrian access from the Texaco Garage to anywhere further south.
- The 2013 Local Area Plan for Blessington shows a proposed Blessington Outer Ring Road or Bypass, with lands in the environs identified for potential routes. These indicate a potential junction and access spur to this new road at the south of our lands.
- In 2019, prior to purchasing our lands, we sought confirmation from Wicklow County Council regarding these proposed works. In 2019 and again in 2020, we were advised in writing that there were no road improvement plans on this stretch of road.
- With the above resident concerns in mind, and with a view to opening up safe access to our remaining lands to aid their further development, we engaged POGA Consulting Engineers to draft up the proposed road re-alignment for this section of the N81.
- On 31st October 2023 Dunmoy, along with our Architects and Engineers, had a Teams call with the WCC Road Engineers, John Bowes (Snr Engineer, Transport & Roads), Brendan Doyle (Project Liaison Officer for Transport & Roads) and Patrick Byrne (District Engineer, Baltinglass Municipal District).
- At this meeting, we asked for the Engineering teams' input on a proposed realignment proposal. The engineers from WCC noted that they could see merit in our proposal to address the accident black spot and encouraged us to look at a proposed route for the N81 that was closely inline with the existing N81. The Engineering team were broadly supportive of our proposal.

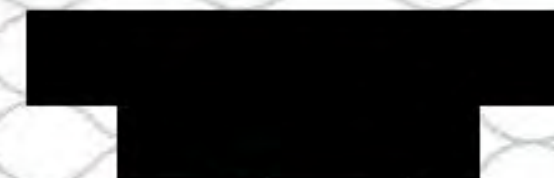
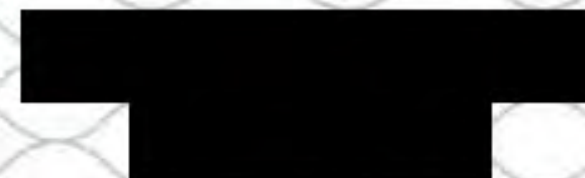


Infrastructure - Roads Proposal

- This proposed scheme has been drafted by POGA, our Consultant Engineers, and introduces two roundabouts and additional street infrastructure, footpaths and a dedicated cycle path (supporting the **Active Travel Strategy Map 6**). This allied with low-level lighting and a proposed lower speed limit, will deliver lower traffic speeds as vehicles enter Blessington from the South along the N81. Our proposed route for the N81 mirrors the path of the existing N81 and provides a future access road to connect in with any future outer relief road/Blessington Bypass.
- The roundabouts will act as safe access points for our lands to the East and west of the N81, and are strategically placed for safe access and travel on lead up to and from Nolan's Bend (**Section 2.4.2 of Draft Blessington Local Area Plan: Local Transport Assessment**).
- The proposed roundabout to the south will act as a new "Welcome to Blessington" roundabout and mark the southern entrance to the town. This roundabout will also give access to proposed parking for the Open Space outlined in our proposal. And access to any future Bypass and our Enterprise Zoned Land as per this proposal.
- The access road off the roundabout to the northern end is located to align with Irish Water Infrastructure and will give safe access to the residential zoned lands we propose in this proposal.
- In Red on the plan opposite is the extended cycle path we propose will run all the way to the Blessington Lake Greenway (meeting **BLESS20** objective).



Assessment of Draft Plan Zoning for Dunmoy Lands

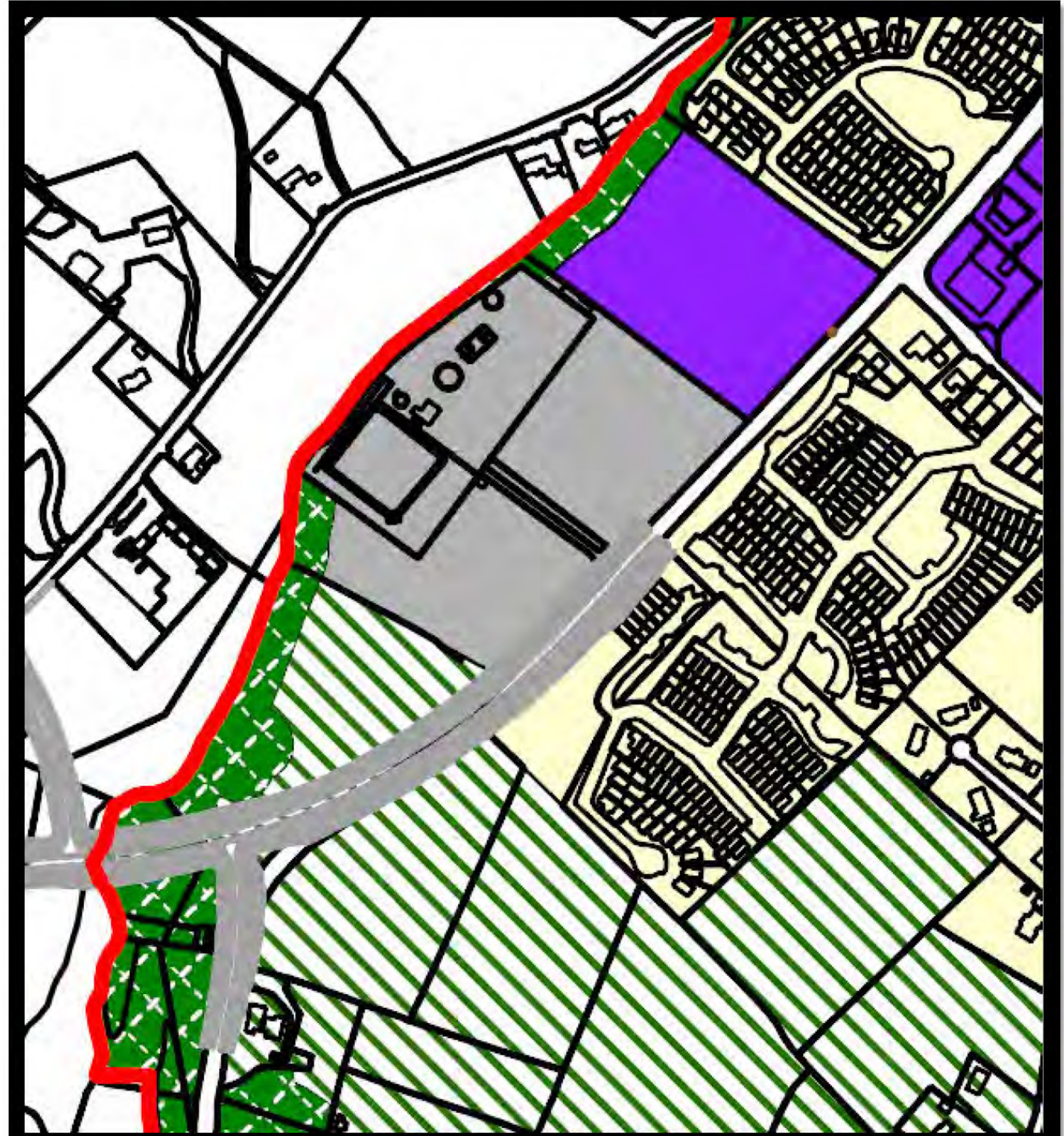


Section 28. Development Plan Guidelines 2022.

Whilst focused on County Development Plans, it is considered that the Guidelines are also relevant to the preparation of Local Area Plans. In particular, in the identification and zoning of lands for new housing, priority should be focused on lands that can most quickly and appropriately provide new houses. Longer term development areas can also be facilitated, for development in the future. (Section 1.3.5.).



Dunmoy Submission v. Draft Plan Proposal



Dunmoy Submission v. Draft Plan Proposal

Dunmoy Proposal	Draft LAP Proposal
4.36Ha Residential Zoned Lands (c. 153 homes)	2.3Ha Employment Zoned Lands
4.03Ha Employment (30 Light Industrial units with associated parking, Enterprise Buildings with associated parking, Creche and Café with parking, plus 136 additional Parking Spaces)	3.36Ha Public Utility including Car Parking Infrastructure
3.78Ha Active Open Space (proposed Rugby Club / Football Club Grounds with Clubhouse & Parking)	0.88Ha Natural Space
N81 upgrade to install cycle & pedestrian pathways, reduce speed limit and provide safe access to Dunmoy lands by way of roundabouts	5.5Ha Agricultural Zoned Lands

- We have carefully reviewed the Draft proposal in comparison to our original submission from April 2024 and remain confident in the merits of our proposal.
- While we agree that our lands are well-suited for Employment Use, the proposed northern site is prime, fully serviced, land better suited for Residential Zoning. The northern site is limited by existing easements for Uisce Éireann, and designing an Employment Use around these easements would not be an efficient use of the land.
- In contrast, Residential Zoning would allow for a more efficient design, making use of the easement areas for open space and roadways in a 150-unit development. This would deliver high-quality, affordable housing, which is in demand in Blessington. This high-density draft proposal aligns with Residential Use zoning guidelines.
- The northern site also benefits from existing transport infrastructure at its northeastern boundary.
- Our proposed location for Employment Use is a larger, 4.5-hectare area, which would be a more efficient use of space and could accommodate commuter parking requirements as outlined in the Draft LAP Proposal.
- Furthermore, the Active Open Space we have identified would serve as a better amenity for the community, in contrast to a small agricultural use so close to a large residential development (Burgage Manor).

Burgage Lands Masterplan

- ✓ **Proposed Residential Lands 4.36Ha:** 153 homes ranging in types from 2-bed apartments to 4-bed detached houses, with associated communal and private spaces, car parking provision and bin and bike storages.
- ✓ **Proposed Employment Lands 4.03Ha:** 30 Light Industrial units; Multiple Enterprise Office Buildings; Creche; Café & 361 car parking spaces.
- ✓ **Proposed Active Open Space 3.78Ha:** 1 full size football / Rugby pitch; 2x 5/7 aside football pitches; Clubhouse and 114 car parking spaces.



Why Residential Zoning Works

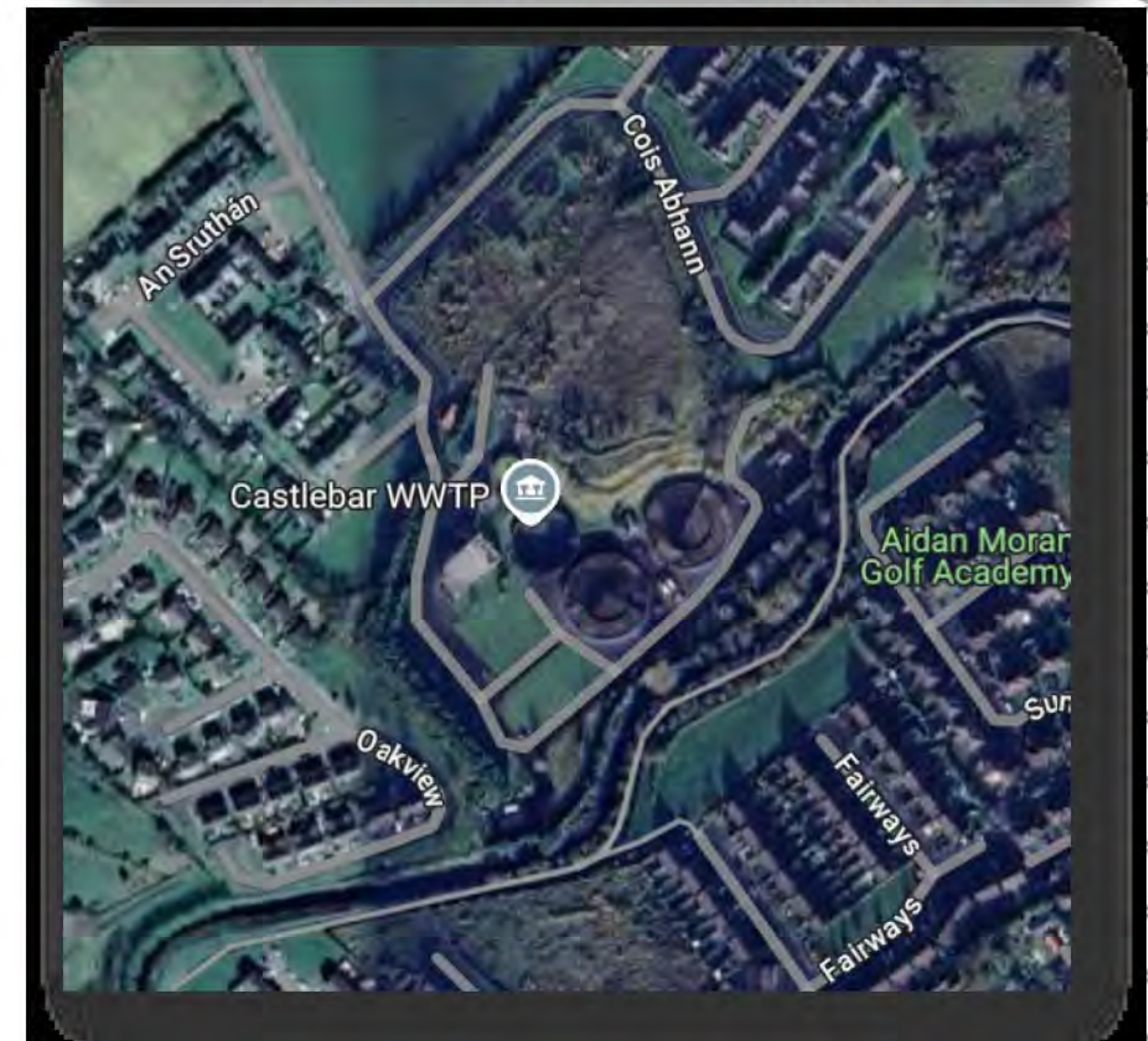


- The site we have proposed for Residential Zoning is fully serviced and borders existing residential developments on three sides (categorised as “infill”).
- Existing easements for Uisce Éireann infrastructure on the site already provide a natural buffer to the Deerpark Watercourse. This area, located at the northwestern boundary of the property, is ideal for Open Space or Natural Areas within a residential development.
- Developing these lands for residential use would create continuity with the neighbouring Blessington Abbey development, which currently has an open fence along the northern boundary. Any employment-related construction here would compromise the privacy and natural surroundings that these current residents enjoy.
- A well-planned residential development would safeguard the privacy and security of Blessington Abbey residents, while enhancing permeability and open space for the local community.
- The pedestrian footpath along the N81 currently ends at the existing bus stop at the northeastern edge of the site (as indicated here). Any future residential development would include a continuation of this footpath along the N81.
- The proposed zoning of the land into Employment, Public Utility, and Natural Areas does not align with our interests as landowners. With the location of services on-site and the suggested zoning in the Draft Plan, the northern parcel of land is effectively excluded from development, undermining the LAP objective of creating an employment zone south of Blessington.

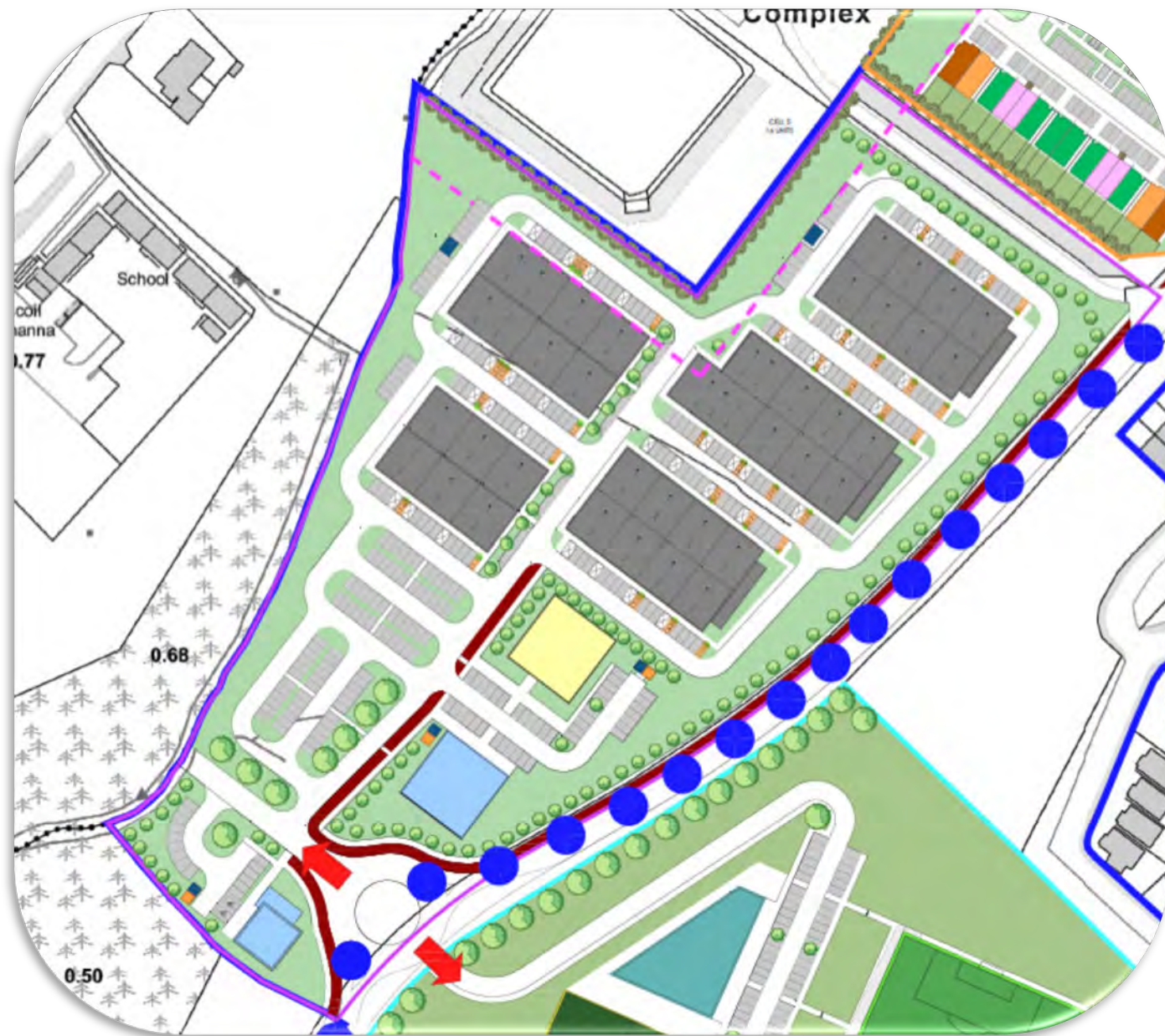
Why Residential Zoning Works contd.

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- We strongly disagree with WCC's assertion in the Draft LAP, which states that our land to the east of the WWTP is "*potentially a less developable site for other uses, such as residential use, given its proximity to the utility installation.*" This claim is contradicted by the findings in the attached report from Barrett Mahony Consulting Engineers, which includes imagery of similar WWTPs across Ireland and their respective locations.
- Out of the 11 locations identified in the report, 7 have residential homes located just meters away from the WWTP, including in Ballinasloe, Castlebar, Carrickmacross, Mallow, Athy, Dundalk, and Drogheda (where new homes are currently being built adjacent to the WWTP). This reinforces our stance on the feasibility of residential development at this site.
- There are no known restrictions on residential development near the WWTP, as confirmed by both our engineers and the WWC planning department. The WWTP employs odour-suppressing technology, so proximity to the facility is not a concern. Nonetheless, as indicated in our draft masterplan, we have incorporated a 20-meter setback along the boundary with the WWTP to address any potential issues that may arise in the future requiring distance from WWTP facilities.
- The proposed zoning of the land into Employment, Public Utility, and Natural Areas does not align with our interests as landowners. With the location of services on-site and the suggested zoning in the Draft Plan, the northern parcel of land is effectively excluded from development, undermining the LAP objective of creating an employment zone south of Blessington.



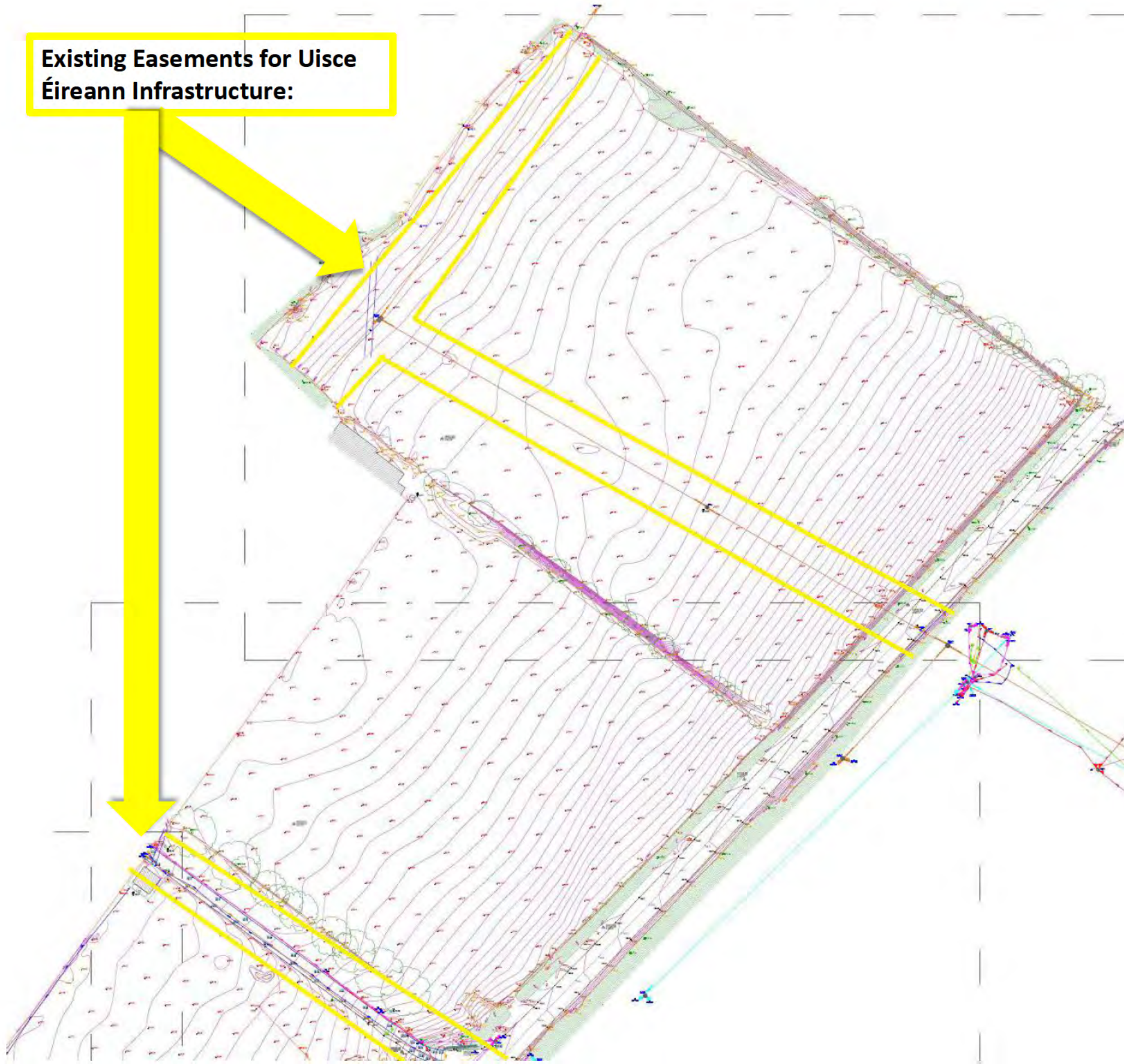
Employment Zoning on Dunmoy Lands



- Since 2013, 2.0 hectares of the Northern Dunmoy lands have been designated for Employment Use. However, due to the existing easements in this area and the Park & Ride zoning to the northeast, this designation has not proven commercially viable from a development standpoint. As a business, we are open to collaborating with end users and are eager to unlock value from the zoned lands we own. We have consistently been open to considering any commercial opportunities for these lands. However, to date, we are unaware of any interest in using these lands for employment purposes.
- The lands south of the Wastewater Treatment Plant (WWTP) are not encumbered by easements for Uisce Éireann infrastructure, unlike the northern lands. As a result, these southern lands present a much larger area, more suitable for Employment Use. Additionally, the required car parking spaces (**Objective BLESS48**) could be efficiently incorporated into this area.
- This draft masterplan, developed for this LAP Submission, spans 4.03 hectares and includes 36 light industrial units, 2 enterprise office blocks, a café, and a creche. It also provides 313 parking spaces, with 93 of these designated for commuter parking.
- The main advantage of these lands for Employment Use is their proximity to the N81, the primary route to Dublin, and their location south of Blessington town. However, the key challenge with the Employment zoning of these lands is the N81 itself, which lacks safe access points. The stretch of the N81 in question has a speed limit of 100 km/h, and significant changes would be required to the road for employment use at any location within our lands.
- Our proposed road realignment aligns with the future N81 Improvement Scheme, with the preferred route matching our proposed roundabout. This would:
 1. Provide safe access and exit for all road users, including cyclists and pedestrians, with roundabouts serving as an effective speed-reduction measure at this intersection.
 2. Enable more efficient land use, with Park and Ride/Car Parking facilities incorporated into an otherwise underutilized location, while also offering passive surveillance from employment use, which would result in a larger area than proposed in the Draft Plan
 3. Provide enhanced security against anti-social behaviour from adjacent residential areas, due to the lands' location near the southernmost boundary of the LAP area.

Benefits of Dunmoy Lands for Residential Zoning

Existing Easements for Uisce Éireann Infrastructure:



Public Utility Zoning on Dunmoy Lands - WWTP

- ✓ **Plant is operated by Veolia on behalf of Uisce Eireann**
- ✓ **Treatment Capacity:** Recent upgrade required no new land for a 50% capacity increase.
- ✓ **Recent Upgrade:** The project involved the following works:
 - ✓ Increase the capacity of the treatment plant to serve a PE of 9,000 (previous capacity was a PE of 6,000);
 - ✓ Installing a new Primary Treatment system, including an inlet pump station and two primary sedimentation tanks;
 - ✓ Upgrading the existing Aeration Tanks;
 - ✓ Installing a new Odour Control System and associated works;
 - ✓ Construction of a new treatment tank and associated pipework to enable future capacity.



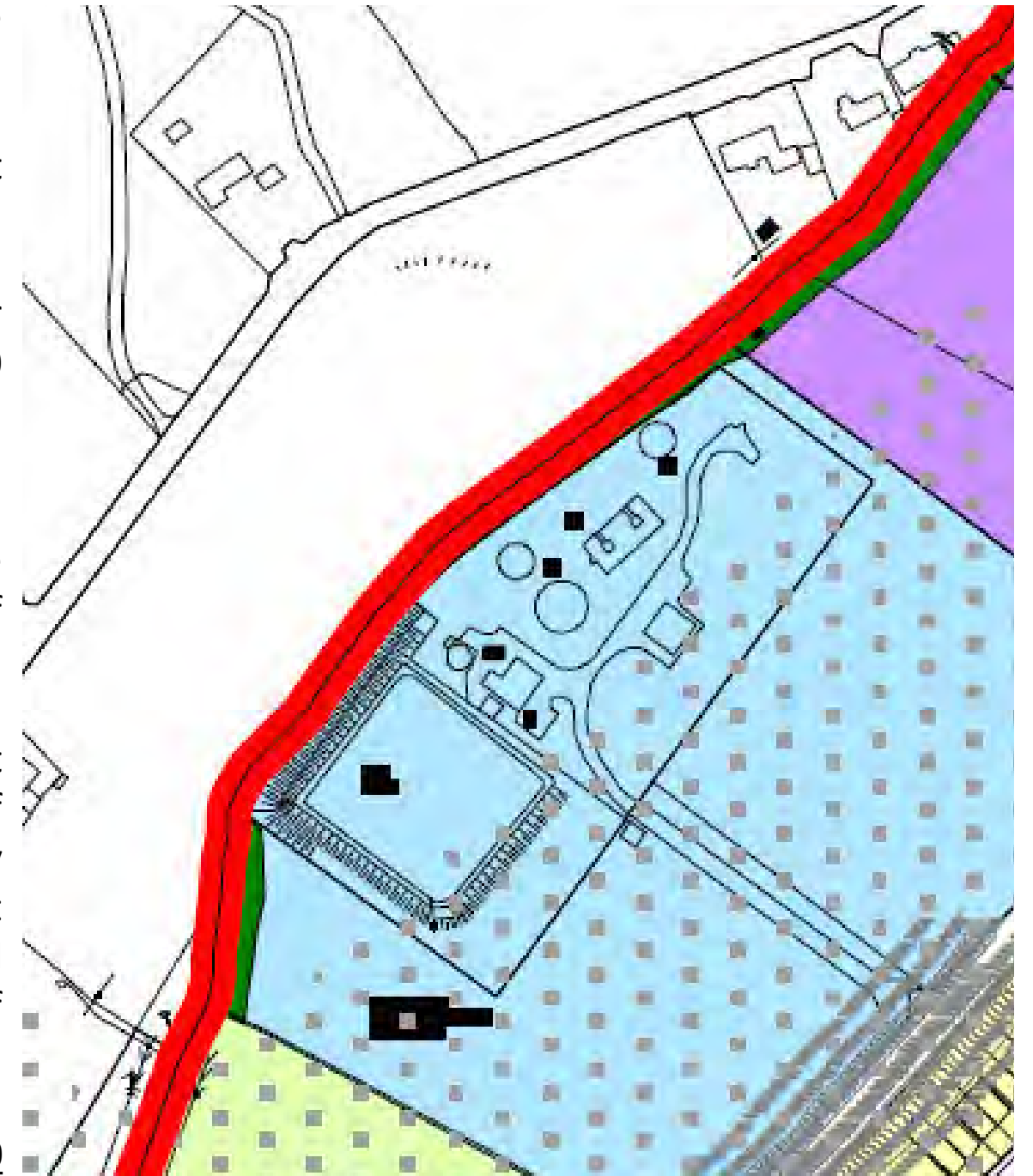
- **Future Expansion:** Dunmoy strongly opposes the proposed need for an additional 3.3 hectares of public utility land beyond the current Wastewater Treatment Plant (WWTP). The WWTP currently occupies 1.8 hectares, serving 6,000 PE, with the capacity to support up to 9,000 PE once the new pumping system and recently installed settling tanks from the 2022 upgrade are fully operational. We consulted with the local engineer to assess the need for extra land for future expansion. The engineer confirmed that future expansion provisions are already accounted for, and the plant could accommodate a PE of approximately 15,000 within its existing footprint.
- The primary question now is how much Blessington is likely to grow in the future. Although this conversation has not been formalized with Uisce Éireann, it is important to note that the current WWTP site in Blessington spans about 18,800m² (1.88 hectares). For context, the new treatment plant in Arklow, designed to serve 24,000 PE (with expansion capacity for 36,000 PE), required 2 hectares of land. We recognize that various technologies are being employed, and that the overflow lagoon at Blessington occupies a significant portion of the footprint. However, we believe that with more efficient use of the current footprint, it is more than adequate to accommodate any future expansion plans.





- ✓ For this LAP submission, we engaged Barrett Mahony Consulting Engineers (BMCE) to review Uisce Éireann Waste Water Treatment facilities across Ireland to determine the required square meters per Population Equivalent (PE).
- ✓ BMCE concluded that the current layout of the Blessington WWTP is inefficient and underutilized. Consequently, the proposed Public Utility zoning is much larger than necessary for any reasonable future expansion of the Blessington population.
- ✓ As part of their review, BMCE assessed 11 other wastewater treatment facilities in Ireland and found that, on average, only 0.88m^2 per PE is needed for efficient wastewater treatment.
- ✓ Currently, Blessington WWTP operates at 2.1m^2 per PE, meaning the existing WWTP footprint can easily accommodate 21,360 PE at the more efficient rate of 0.88m^2 per PE.
- ✓ The plant's current capacity is 6,000 PE, but it has been physically expanded with additional tanking to support 9,000 PE. The only requirement for utilizing the 9,000 PE capacity is additional pumping capacity; no extra physical space outside the current fence line is necessary for this expansion.
- ✓ In discussions with the Engineer that operates the Blessington WWTP he advised that Stage 1 of the plant has sufficient tank capacity for up to 15,000 PE, handling rags and grit. The only requirement here would be a capital investment in additional machinery capacity—no additional land is needed.
- ✓ For Stage 2, the plant engineer advised that additional settling tanks would be required for up to 15,000 PE. These tanks filter water through multiple stages and would need capacity upgrades, along with aeration cells that would also require enhancement. However, the existing plant site can accommodate these upgrades by optimizing the use of parking areas and other underutilized spaces within the current fence line.
- ✓ In Summary the plant engineer is of the opinion that there is sufficient space within the fence line for expansion up to at least 15,000 PE.

- ✓ In considering whether to retain or zone part of our land for potential future expansion, we recommend that the Council, in partnership with us, engage with Uisce Éireann to assess their long-term land requirements. We note that: a) expansion may not be necessary due to the existing plant's capacity and potential for further expansion; and b) if expansion is required on Dunmoy-controlled land, the Council should zone the land based on Uisce Éireann's specific needs. Only Uisce Éireann can provide definitive guidance on this matter, and we propose initiating a three-way discussion between the Council, Uisce Éireann, and ourselves.
- ✓ Dunmoy have engaged with Uisce Eireann and their developer services team have been primed to expect contact from ourselves and WCC after the submission of this document.
- ✓ The Blessington plant currently occupies an area of 18,800 m². In theory, with an optimal design similar to other Irish Water facilities, this area should be capable of accommodating a population equivalent (PE) of 21,360 (18,800 m² / 0.88 m² per PE).
- ✓ While a refurbishment may not fully utilize all available space or require a complete reconfiguration or rebuild of the plant, a larger area per PE would likely be needed. Even at a rate of 1 m² per PE, the plant should still be able to serve a population equivalent of 18,800 PE, which is significantly larger than the current population of 5,600 in the townland.
- ✓ The proposed zoned area of 54,000 m² is completely inappropriate and unnecessary. Drogheda WWTP at 55,600 m² can serve 101,600PE, representing a potential expansion of circa 20 times the current population of Blessington – this would require Blessington to explode in scale (Bigger than Limerick) which is entirely unsustainable given lack of public rail infrastructure etc. This level of growth appears excessive and is not deliverable in Blessington given the limitations of existing services and infrastructure – even at a WWTP level the pumped water main out of the site which could in of itself materially limit the scale capacity irrespective of any space constraints.
- ✓ **We are confident that the existing footprint can accommodate the proposed future capacity of up to 21,360 PE without the requirement to extend the footprint of the current WWTP.**



Public Utility Zoning on Dunmoy Lands – Park & Ride



2013 LAP Land Use



2024 Draft LAP Land Use



Dunmoy Proposed Land Use

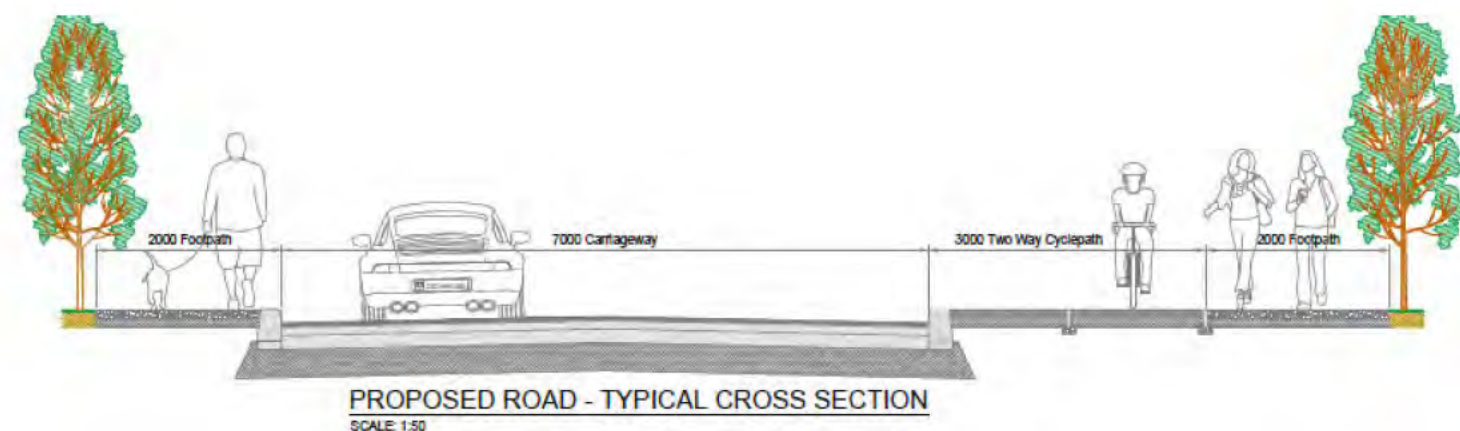
- The proposed car parking facility is intended to serve as long-term commuter parking for the town.
- A section of our property has been designated as Park and Ride since 2013 in relation to the planned N81 Road Improvement Scheme. However, in 2021, Minister for Transport Eamon Ryan acknowledged that these planned upgrades were excluded from the National Development Plan (NDP) 2018-2027, effectively postponing any work on this project until after 2027.
- As the road upgrade is not expected to occur within the timeframe of the current Local Area Plan (LAP), it is recognized that Wicklow County Council (WCC) deems it necessary to retain some land zoned for future park and ride facilities.
- We believe it would be more prudent to align the land use strategy by coordinating the parking facility with the proposed Employment zoning and Active Open Space zoning on the lands that are more prone to flooding. These areas are unsuitable for constructing vulnerable structures and thus are better suited for this type of development.

N81 Active Travel Route

Our proposed N81 Realignment aims to create safe pedestrian and cycling pathways along this hazardous stretch of road leading to Nolan's Bend.

In addition to low-level lighting and a suggested lower speed limit, this will help reduce traffic speeds as vehicles approach Blessington from the south along the N81. The proposed route for the N81 follows the existing path and offers future access to connect with any potential outer relief road or Blessington Bypass.

The roundabouts will serve as safe access points for properties on both the east and west sides of the N81, strategically located in areas where, due to ground conditions, alternative development would be effectively restricted.

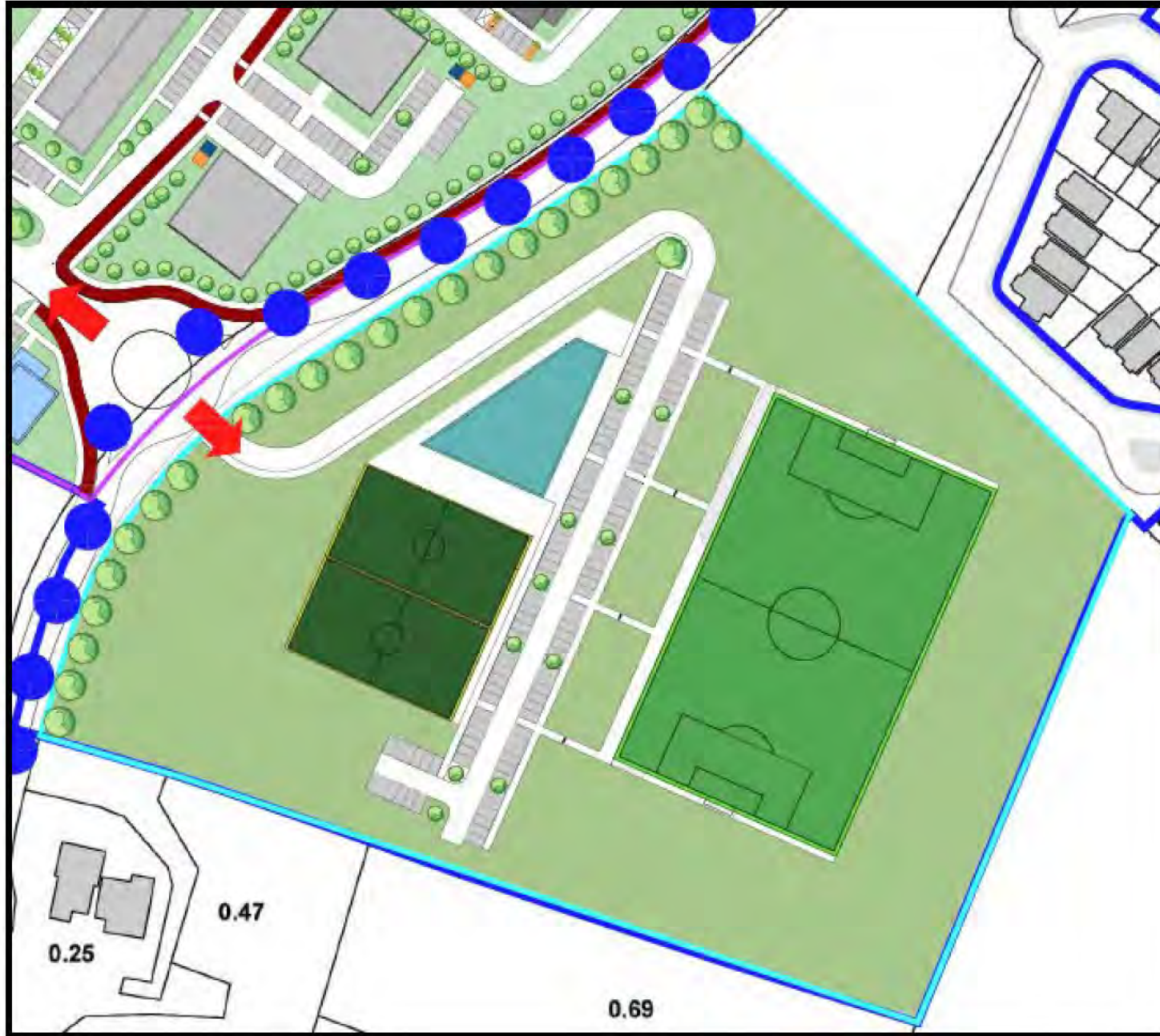


Natural Space Zoning & Flood Risk on Dunmoy Lands

- We acknowledge the presence of the Deerpark Stream, which forms the entire western boundary of our property.
- We note that a buffer zone is necessary for flood risk management and ecological protection, and this has been considered in the attached draft master plan.
- The northwestern fields are also subject to an easement for Uisce Éireann infrastructure, and we have no objection to this area being designated as Natural or Open Space within a Residential Use zoning. This area can easily be integrated into any residential development for the benefit of future residents – as can be seen in the Masterplan layout here.
- Given that the southwestern lands are more prone to flooding, this area is ideal for car parking within any future development. The use of hardstanding and permeable surfaces will be crucial to managing flooding in this area.



Active Open Space vs. Agricultural Use



- The proposed use of Active Open Space in southern Blessington would be a significantly more beneficial option for this area than agricultural use.
- The realignment of the N81 would provide safe access to the site, and the addition of 114 car parking spaces and club house facilities would address the area's infrastructure needs, especially as it is situated along the proposed Greenway Feeder Route.
- The easternmost field is relatively flat and offers stunning views of Blessington Lakes, making it an ideal location for clubs that require field space (such as rugby or football).
- Both the local rugby and football clubs are seeking permanent facilities in the Blessington area, and this site is perfect for such use.
- The development of Burgage Manor also offers excellent opportunities for passive surveillance, reducing the risks associated with large, unattended open spaces. Additionally, diverting traffic away from the access point within Burgage Manor is a major benefit to the local residents.
- Our proposed N81 realignment includes a footpath and cycle path that will lead directly to the access point on the N81, ensuring safe access for all users.
- In line with WCC's goal to minimize the impact of floodlights on the reservoir, we propose limiting the use of these playing fields to daylight hours only, eliminating the need for floodlighting entirely.

Assessment of Draft Plan for Residential Zoning

[REDACTED]

[REDACTED]

Assessment of Residential Zoned Lands

In Blessington's first Local Area Plan (LAP) from 2013, significant areas of land were zoned as New Residential across 14 separate locations. Despite 11 years of Residential zoning, only 4 of these sites have been developed, with 3 additional sites having sought planning permission (2 refusals and 1 approval). The 2013 LAP set a target of 1,840 new homes by the end of 2022. The locations for 892 of these new homes were specified in the 2013 LAP, distributed across 4 designated Action Areas (now SLOs). As of 2024, only 209 new homes have been built on lands zoned as New Residential in the 2013 LAP

2013 LAP Reference	Draft 2024 LAP Reference	Units Specified
Action Area 1	SLO1	150
Action Area 2	SLO5	153
Action Area 4	SLO 4	476
SLO1	SLO7	113
Total		892

Whilst similar specific housing number targets have not been outlined in the current Draft LAP, the same lands are zoned Residential, and it can be assumed that similar target numbers, if not more given the focus on higher density, are expected from the current locations.

The Housing Objectives do however specify the following:

- *To adhere to the objectives of the Wicklow County Development Plan built-up population and housing as are applicable to Blessington and ensure that the provisions of the plan creates a **flexible land use framework that allows for housing targets to be fulfilled**.*
- *A minimum of 30% of the targeted housing growth shall be directed into the existing built-up area of the settlement, on lands zoned ‘town centre’, ‘existing residential’ and ‘mixed use’. In cognisance that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this plan or the associated tables on the number of units that may be delivered within the built-up envelope of the town.*
- ***In order to ensure however that overall housing and population targets can be delivered, land may be zoned for new residential development outside of the existing built-up envelope, subject to the amount of zoned land not exceeding 70% of the total housing target for that settlement.***
- ***To require that new residential development represents an efficient use of land and achieves the highest density possible, subject to the reasonable protection of existing residential amenities and the established character of existing settlements.***
- *To **promote and facilitate in-fill housing developments**, the use of under-utilised / vacant sites and vacant upper floors in the town centre for residential use and **facilitate higher residential densities at appropriate locations**, subject to a high standard of design, layout and finish;*
- *Housing occupancy controls: As a ‘self-sustaining growth town’, Blessington should provide for the housing demands generated from people from across the County and region.*

Residential Zoned Land	Area	Priority	% of Total Zoned Land
Town Centre Location			
Blessington Demesne East	5.4	1	11%
Blessington Demesne North	9.1	1	18%
Dorans Pit	12	2	24%
Santryhill	2.4	2	5%
Newpaddocks	1.1	2	2%
Outside Town Centre Location			
Burgage More	3.6	1	8%
Blessington Demesne West	6.5	2	13%
Burgage More North	5.6	2	11%
Burgage More South	3.6	2	8%
Total Area	49.3		

In the Draft Plan, 49.3 hectares of land are zoned for Residential purposes, with 37% designated as RN1 and the remaining 63% as RN2 priority.

The distribution of these lands is split 60:40 between the Town Centre core and areas outside it.

Active planning permissions are in place for two of the three RN1 sites: Blessington Demesne East (11%) and Burgage More (8%). A revised planning application for Blessington Demesne East was submitted in November 2024. Blessington Demesne North, following a recent refusal by An Bord Pleanála, is awaiting the finalization of this LAP process before a new planning application can be submitted.

As a result, the 3.6 hectares RN1 lands in Burgage More, owned by WCC, is the only site with real potential for housing development that can be completed and occupied within the lifespan of this draft Plan.

Overall, only 37% of the lands zoned for residential use (RN1 or RN2) have the potential to be developed in the short term or within the timeframe of the Draft LAP.

Proposed Residential Zoned Lands

- **Priority 1 – RN1**
 - SLO8 – Blessington Demesne North – 9.1 Hectares (No planning on site)
 - SLO6 – Burgage More – 3.6 Hectares (LA Scheme 106 Houses – No Decision?)
 - Other – Blessington Demesne East – 5.4 Hectares (New Planning application Submitted 8th November 2024)
- **Priority 2 – RN2**
 - SLO1 – Blessington Demesne West – 4.2 Hectares
 - SLO2 – Blessington Demesne West – 2.3 Hectares
 - SLO5 – Burgage More North – 5.6 Hectares
 - SLO7 – Burgage More South – 3.6 Hectares
 - Other 1 – New Paddocks – 1.1 Hectares
 - Other 2 – Santry Hill – 2.4 Hectares
- **Mixed Use**
 - SLO4 – Doran's Pit – 12 Hectares

ZONING	OBJECTIVE	DESCRIPTION
RN1: New residential Priority 1	To provide for new residential development and supporting facilities during the lifetime of the plan.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
RN2: New residential Priority 2	To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement after the activation of Priority 1 lands.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.

Distance to Local Key Amenities

Destination	Dunmoy Lands	SLO8	SL06	Other	SLO1	SLO2	Other 1	Other 2	SLO5	SLO7	SLO4
Zoning	Proposed RN1	RN1 – Priority 1			RN2 – Priority 2						Mixed Use
To Aldi	1.77km	964m	2.23km	956m	2.48km	1.52km	775m	718m	2.21km	2.44km	896m
To Dunnes	1.38km	1.12km	1.83km	496m	1.77km	1.66km	1.45km	1.32km	1.8km	2.02km	1.5km
To Central Bus Stop	1.24km	1.28km	1.72km	654m	1.9km	1.83km	1.28km	1.15km	1.7km	1.93km	1.33km
To Petrol Station*	131m	973m	553m	905m	2.17km	1.56km	776m	654m	541m	764m	825m
To Primary School**	1.23km	430m	2.11km	958m	2.79km	660m	802m	1.17km	1.67km	1.89km	1.88km
To Secondary School	1.26km	1.81km	1.71km	1.25km	1.3km	2.42 km	1.88km	2.12km	1.69km	1.91km	1.93km

* Distance to closest Petrol Station

** Distance to closest Primary School – For most locations this is No1 School. There is insufficient capacity in this school to cater to the residential densities required for these sites.

Assessment of SLO1 - RN2 Proposed Zoning

This SLO measures c.10 ha and comprises c3.9 ha zoned OS1 'Open Space', c.0.7 ha zoned OS2 'Natural Areas', c.1.3 ha zoned CE 'Community and Education', and c4.1 ha zoned RN2 'New Residential Priority 2'.

- Before 2013, Blessington did not have an official town plan, and as a result, there was no land zoning (as stated in note 6 of the 2010-2016 Wicklow County Development Plan).
- In the 2013-2019 Local Area Plan for Blessington, these lands were designated as Action Area 1, with proposed land use zonings that included plans for 150 new homes. The same zoning designations have been carried over into the current Draft Plan, with the main change being that the Residential Use is now classified as "Priority 2 Residential" instead of the "Proposed Residential" designation in the 2013 plan.
- Over the past 11 years, these lands have been consistently designated for Residential use, but no planning applications have been submitted to develop the necessary housing at this location. Since these lands are privately owned and not under the control of a development company, it is unlikely that the planned uses will be realized within the duration of the current draft LAP, especially if the landowner is tasked with completing the new road connecting the GAA grounds and Naas Road. As a result, maintaining the residential zoning for these lands may delay the delivery of essential housing and sports infrastructure in the area.



2013 LAP Land Use

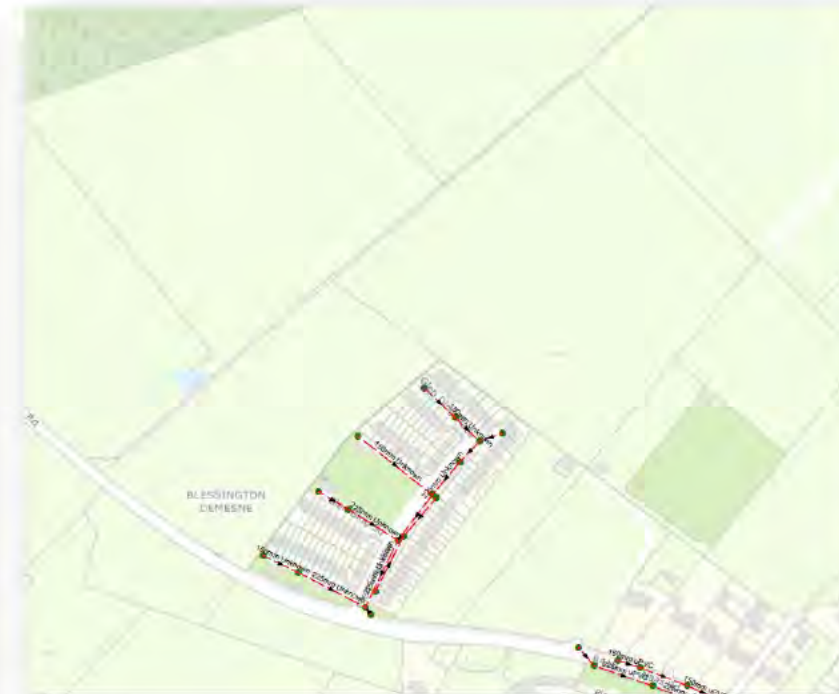


2024 Draft LAP Land Use

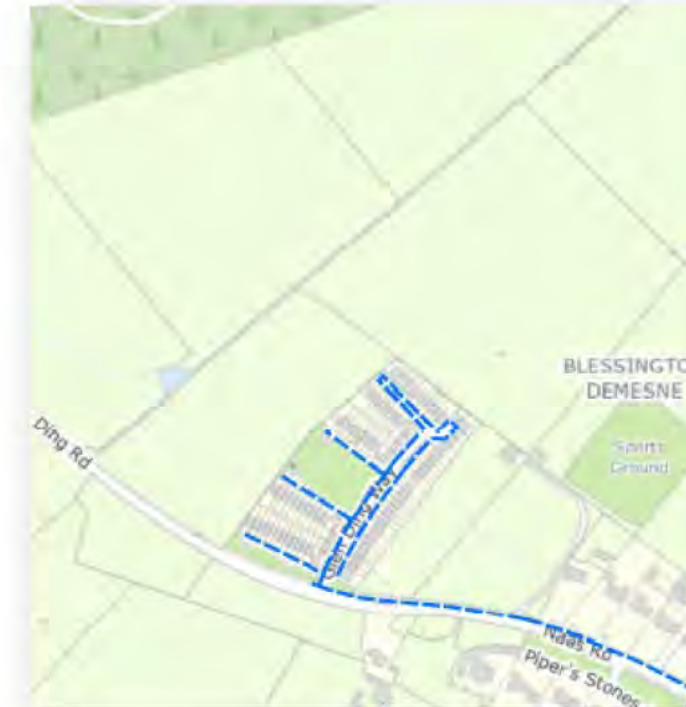
Assessment of SLO1 - Services



Storm Water Infrastructure



Foul Infrastructure



Gas Infrastructure



ESB Infrastructure

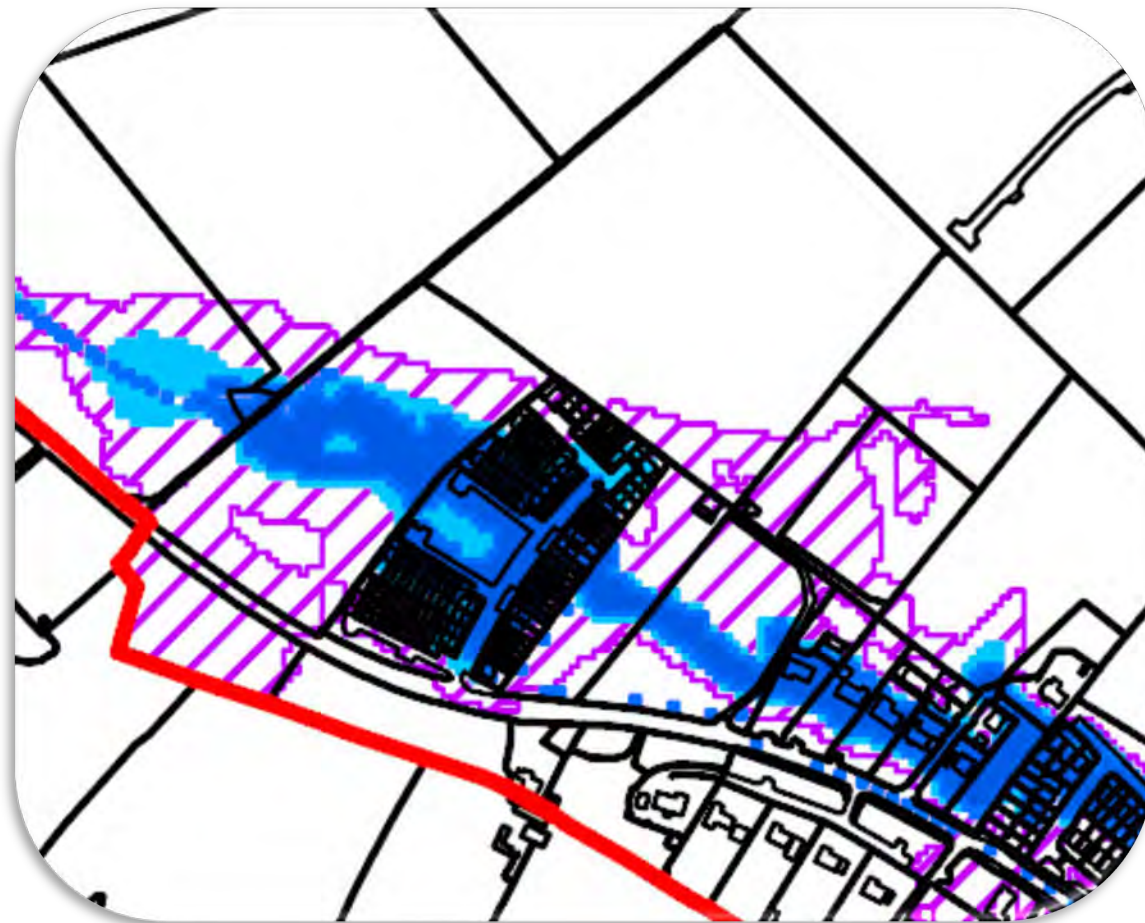
The Blessington Demesne West Lands are classified as "Serviceable" in the Draft LAP written statement.

The accompanying images from Uisce Éireann, Gas Networks Ireland, and ESB indicate that while there are services nearby, significant work remains to connect most of the site to essential utilities.

Major planned road upgrades, including a new connection between the Naas Road and Oak Drive, are also necessary before housing can be built in this area. The Draft Plan imposes strict conditions for this road development, aiming to minimize tree and hedgerow removal while maintaining a "strong sense of enclosure" and preserving the visual amenity of the Glen Ding Forest from Main Street and the Blessington Inner Relief Road.

Additionally, the requirement to design and develop the proposed public park within the designated OS1 lands, including pedestrian and cycle access, before the first home is occupied, will significantly delay the provision of much-needed housing in Blessington during the lifespan of this Local Area Plan.

Assessment of SLO1 - Flood Risk



The flood risk map for SLO1 indicates that these areas fall within Flood Zone A, making them highly prone to flooding in a 1 in 100-year event. The purple hatching further highlights the extent to which the flood risk encroaches on lands designated for Residential Priority 2 use.

This flood map also reinforces the unsuitability of these lands for development, as Residential Use is classified as Highly Vulnerable and is not allowed in Flood Zone A areas.

The CE Zoning would also be affected, requiring substantial mitigation measures for any proposed development. The Draft Plan suggests potential educational use for this site. However, the risk of future flooding significantly limits the feasibility of establishing a school here, as schools are considered Highly Vulnerable and, therefore, are not permitted in Flood Zone A areas.

Assessment of SLO1 - N81 Realignment

The preferred route for the potential future realignment or upgrade of the N81 further limits the development of the proposed Residential Priority 2 zoned lands.

Although the road is not currently planned at either the National or Local level, the possibility of its construction along this preferred route affects any potential future housing or educational developments in SLO1.

With the numerous restrictions on these lands, there is limited potential to address the urgent need for housing in this “preferred location.” As a result, it fails to meet the country's housing shortage requirements, does not align with the Government’s 2030 housing goals, and while the location might appear suitable on paper to meet housing priorities in Blessington, in practice, building housing in a meaningful way will be unfeasible.



Assessment of SLO5 - Housing

The SLO measures c.12.2 ha and comprises c.5.6 ha zoned RN2 'New Residential Priority 2', c.0.4 ha zoned RE 'Existing Residential', c.5.9 ha zoned T 'Tourism', and c.0.3 ha zoned OS2 'Natural Areas' zonings.

The proposed Priority 2 Residential lands are located at an equal distance from the centre of Blessington, similar to the lands we have proposed for Residential zoning.

The Draft LAP prioritizes Residential zoning for sites that are centrally located and within a 10-minute walk from Blessington's centre. This site does not meet those criteria.

In the 2013 LAP, these lands were designated as Action Area 2, with the aim of delivering 150 new homes. However, despite being zoned as Proposed Residential for the past 11 years and classified as "Serviced" lands, the private landowners have never sought planning permission. In-fact, no planning application has been submitted on these lands since 2004.

Given the current ownership, retaining the Residential zoning on these lands as Priority 2 for the next LAP period suggests that these lands are unlikely to be developed during that time, meaning they would not contribute to addressing the housing needs of Blessington residents.

Additionally, with the proposed greenway route along the southern boundary of these lands, significant road upgrades will be necessary to ensure safe travel routes for pedestrians and cyclists. This will further reduce the area available for residential development.

2013 LAP Land Use



2024 Draft LAP Land Use



Assessment of SLO7 - Housing



2024 Draft LAP Land Use



2013 LAP Land Use

The SLO measures c.3.6 ha and comprises c.3.6 ha zoned RN2 'New Residential Priority 2'.

These lands are located at the furthest point of all the proposed residentially zoned areas within the Draft LAP, nearly 2 km from the centre of Blessington.

Previously designated as SLO-1 in the 2013 LAP, this area was zoned for low-density housing to align with existing neighbourhood developments and reflect the rural character of the region.

Considering the emphasis on "location" in the Draft LAP Land Use Map by WCC, it is unnecessary to maintain the Residential zoning for these lands in the next LAP period. While the residential RN1 lands to the north may potentially be developed during this LAP cycle, these lands, which are not owned by WCC like those of SLO-6, are unlikely to be developed in this timeframe. These lands have been zoned Residential since 2013 but have not seen any planning applications since 2004, when the owners sought permission to build a log cabin. This suggests that the landowners have shown little interest in developing the area for much-needed housing in Blessington.

Moreover, the development restrictions applied to SLOs 1-4 are not relevant here, benefiting these lands, which are not fully serviced and are located further from Blessington's town centre compared to the proposed residential areas.

Assessment of SLO7 - Services



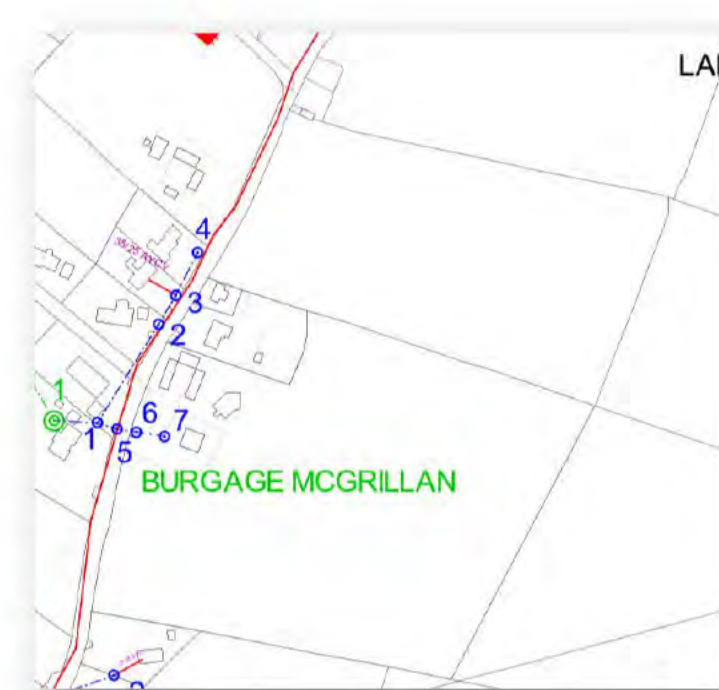
Storm Water Infrastructure



Foul Infrastructure



Gas Infrastructure

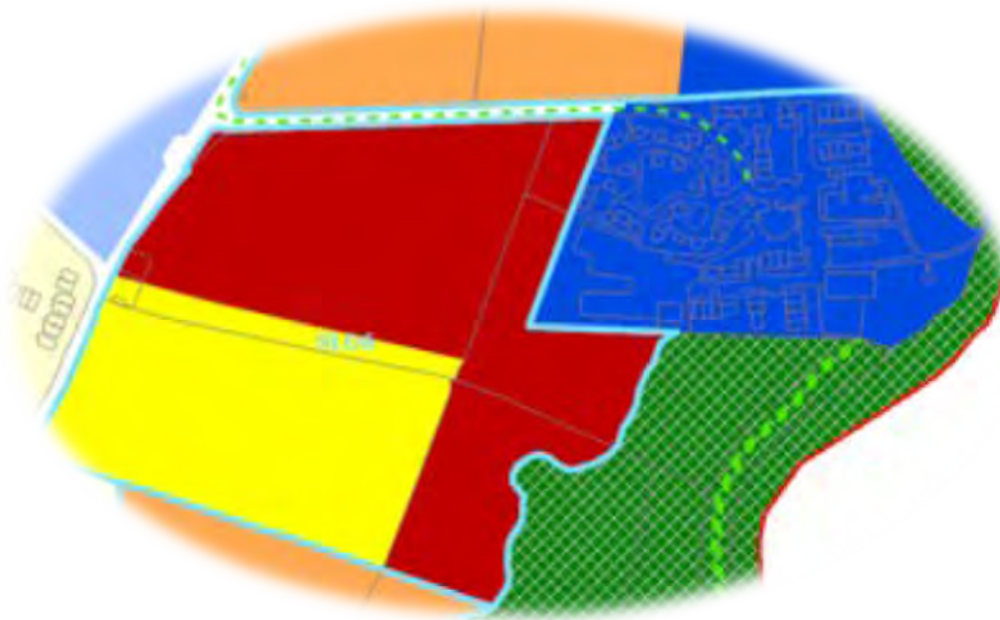


ESB Infrastructure

These snapshots from Uisce Éireann, Gas Networks Ireland and ESB show that, whilst there are some services in the vicinity, there is still substantial works to be undertaken to connect the entire of the site to essential services. The Draft LAP Written Statement outlines the lands in Burgage More South as “serviced” lands, this is not the case, and should be better classified as “Serviceable”, as they require the RN1 lands to be developed to extend the services to this SLO7 site.

Location	Area (ha)	Servicing Status	Area Type	Zoning /Priority
Doran’s Pit	12	Serviced	Urban Neighbourhood*	MU/Priority 2
Santryhill	2.4	Serviceable ⁵	Urban Extension	RN2
Newpaddocks	1.1	Serviceable ⁴	Urban Extension	RN2
Blessington Demesne West	6.5	Serviceable ⁴	Urban Extension	RN2
Burgage More North	5.6	Serviced	Urban Extension	RN2
Burgage More South	3.6	Serviced	Urban Extension	RN2

Assessment of SLO6 - Housing



The SLO measures 9.4 ha and comprises c.5.8 ha zoned MU 'Mixed Use' 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.

These lands are entirely owned by Wicklow County Council.

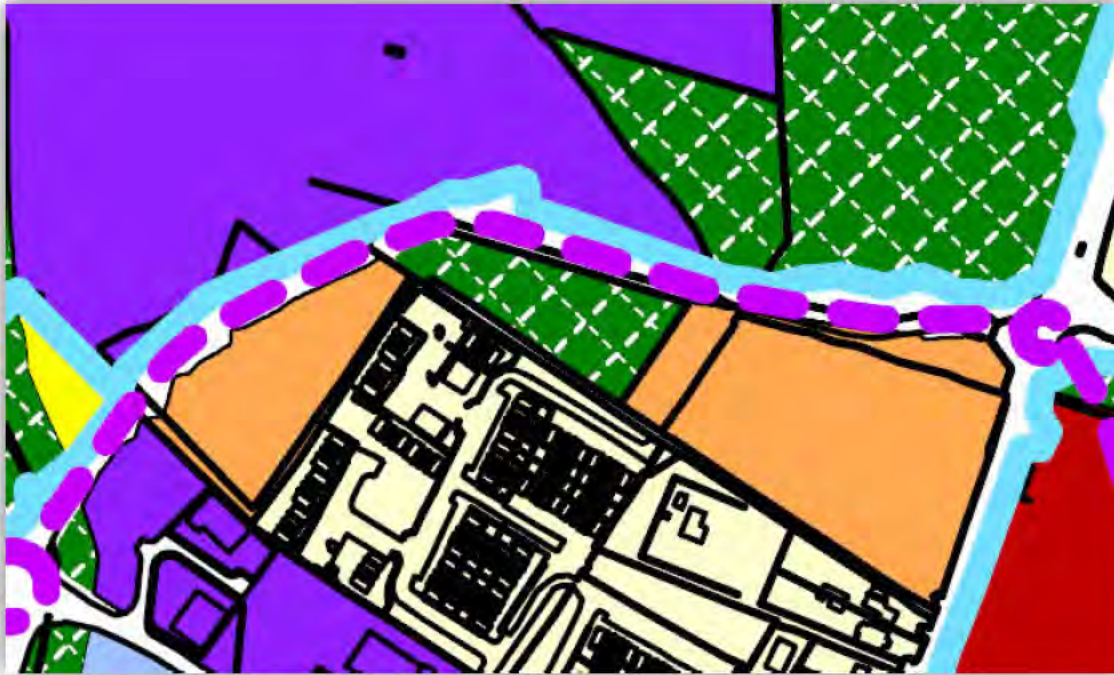
The RN1 lands have approval for 109 units, with a density of 29.4 units per hectare, which is slightly below the minimum allowable density of 30 units per hectare. To meet the required density, this development includes 3-story apartment/duplex units, demonstrating that increasing building height is necessary to achieve higher density on these lands.

The Mixed Use zoning permits Residential RN2 as a possible use. However, in contrast to other RN2 zoned lands, there are fewer restrictive conditions imposed by WCC for residential development on these mixed-use lands.

For example, there is no requirement for a "Strong Sense of Enclosure" or "Strong Passive Surveillance" on the active travel links, and there is no mandate to complete the road infrastructure before starting any residential development.



RN2 Zoned Lands - Housing

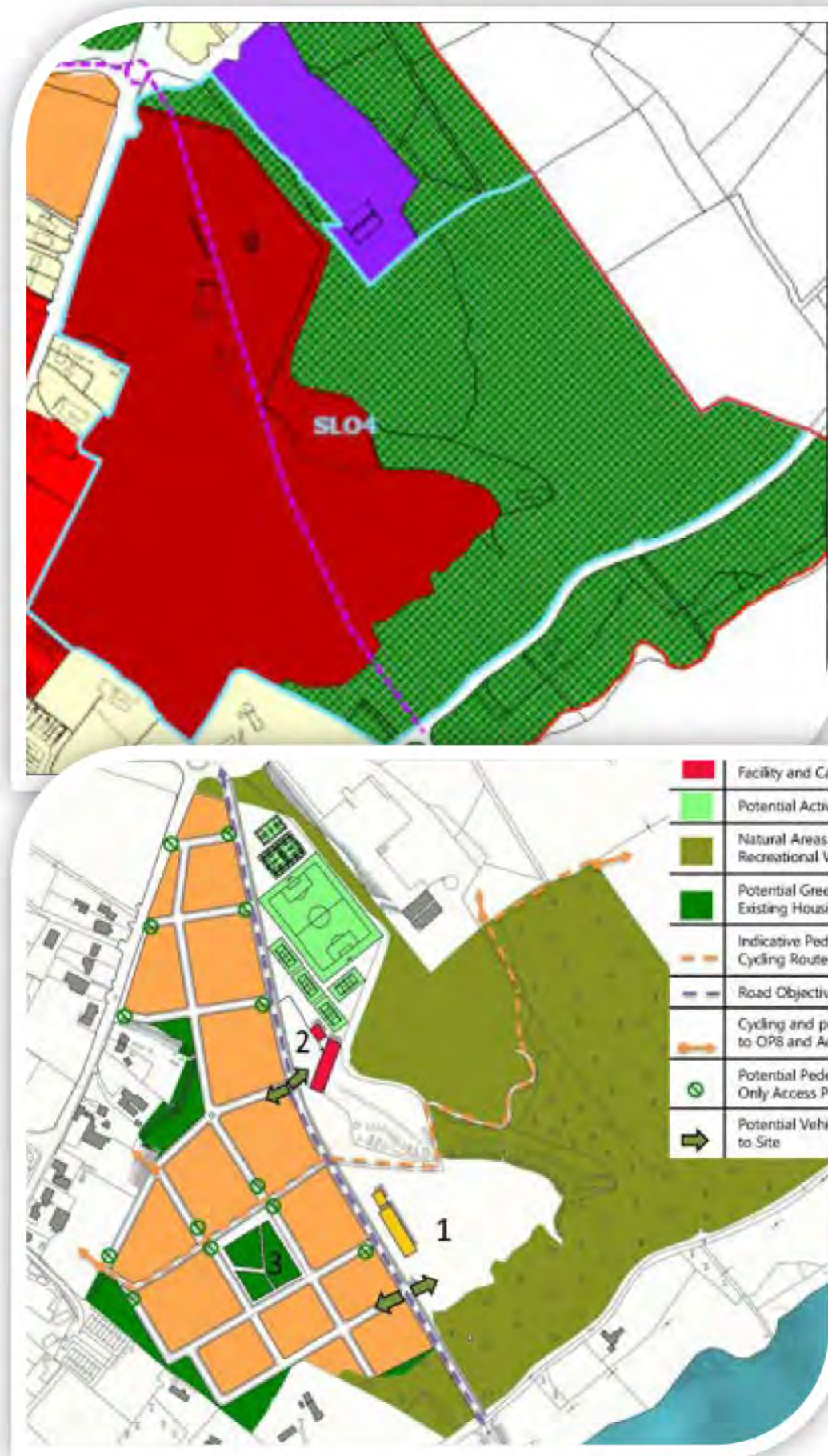


- These RN2 zoned lands are 1 Ha (Newpaddocks) and 2.26Ha (Santryhill) respectively.
- Previously zoned as New Residential, these lands are designated as "Serviceable" in the Draft LAP, contingent upon the completion of the northern section of the Inner Relief Road.
- Apart from their location, these lands do not offer a high-quality setting for homes—particularly the Newpaddocks site, which is immediately adjacent to existing quarry lands and the proposed Employment zone.
- Since these lands were zoned Residential in the 2013 LAP, there has been no planning application on the Newpaddocks lands.
- The Santryhill lands have seen 6 planning applications since 1996, with the most recent planning application being rejected by both WCC and An Bord Pleanála due to, amongst other things, its prematurity due to the requirement to complete the Inner Relief Road at this northern section.
- Like other RN2 sites in the draft LAP, aside from location, our lands offer a much more suitable option for infill development. These lands are bordered by existing residential areas on only one side, whereas our lands are surrounded by residential development on three sides.

Assessment of SLO4 – Mixed Use

The SLO measures c.33.4 ha and comprises c.18 ha zoned MU 'Mixed Use' and c.15.4 ha zoned OS2 'Natural Areas' zonings.

- Development on this site is required to be laid out as as urban streets and squares with a well-enclosed central park/plaza focal point and appropriate buffers to existing adjacent residential areas.
- Additional requirements for construction of housing in this SLO specifically requires:
 - ☐ delivery of the road objective linking the N81 to Kilbride Road/Knockieran Bridge
 - ☐ development of a pedestrian/cyclist only street (with two-way segregated cycle track) running southwest - northeast through the SLO providing an active travel link to Blessington Main Street;
 - ☐ multi-purpose community building fronting onto the central park/plaza
 - ☐ childcare facility of a sufficient size fronting onto the central park/plaza
 - ☐ Strong Sense of Enclosure with Strong Passive Surveillance elements
 - ☐ development of at least c.3.3 ha of active open space / sport uses and ancillary facilities on the north-eastern side of the road objective in the vicinity of the N81.
- **Being proximate to the town centre the site, in theory, presents a good opportunity for residential development. However, reality presents the opposite. The onerous requirements outlined for this location, prior to commencing construction of housing, along with the vast amount of remediation works required to construct anything here detract substantially from the site's optimal location from a viability standpoint. Roadstone or any future developer would have to invest millions of euro into this site without any guarantee of securing sufficient density on site to generate any return. It is very likely that development of the site, if ever, will be beyond the lifetime of the draft plan, once adopted.**



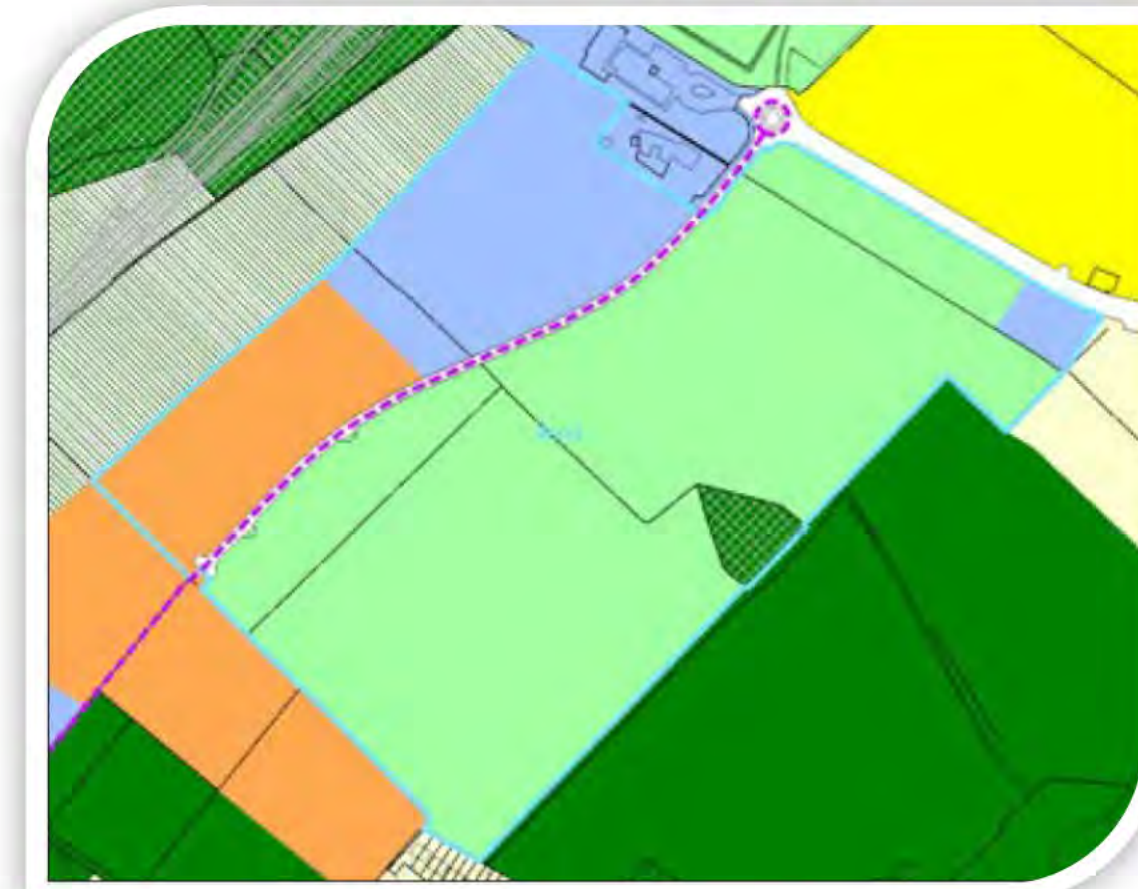
Assessment of SLO2 - RN2 Proposed Zoning - Housing

This SLO measures c. 21.8 ha and comprises c.14.9 ha zoned for AOS 'Active Open Space', c.0.4 ha zoned for OS2 'Natural Areas', c.3.8 ha zoned CE 'Community & Education', and c.2.3 ha zoned RN2 'New Residential Priority 2'.

Cairn Homes owns the lands outlined in SLO2, with the primary uses remaining similar to that of the 2013 LAP. The key change here is the change from Employment Use to Active Open Space. The 2.3ha zoned Priority 2 remains unchanged and has been included in a planning application submitted by Cairn recently refused by ABP, for these lands and those of SLO 8.

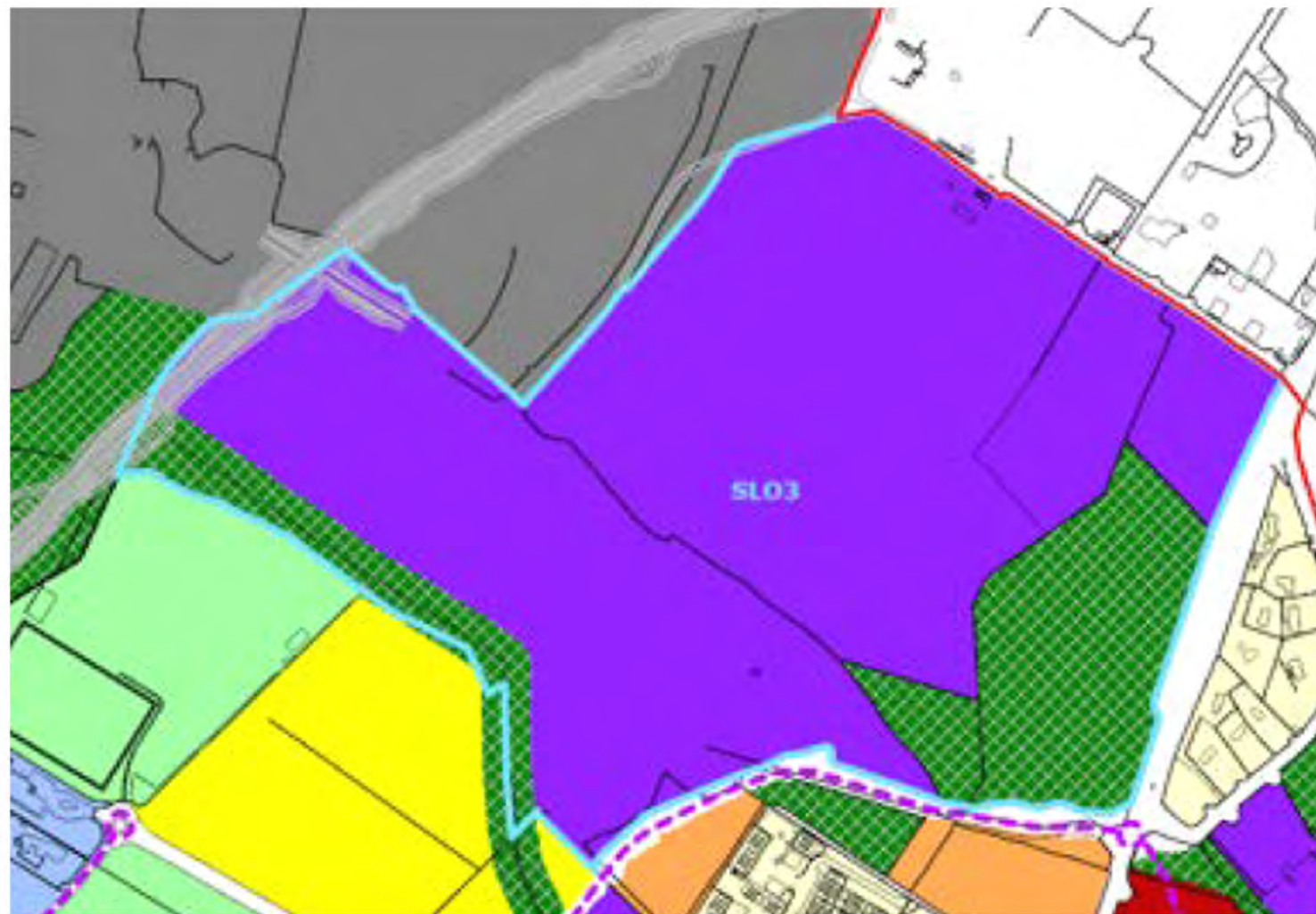


2013 LAP Land Use



2024 Draft LAP Land Use

Assessment of SLO3 – Employment Use



The SLO measures c.51.5 ha and comprises c.41.9 ha zoned E 'Employment' and c.9.6 ha zoned OS2 'Natural Areas' zonings

This location is a former quarry, and as such requires significant remediation to make safe for any uses. In addition, the requirement to lay out a public amenity nature park with active travel routes to Glen Ding Forest and along the Deerpark Stream would require significant financial investment.

WCC Representative advised us that the intention here is to attract a single use employer for these lands. If this were to be the case, then these lands, would be a more logical location for future car parking / Park & ride facilities than on the Burgage lands to the south of Blessington.

Given the existing levels of vacancy in the town from an employment perspective, and the lack of public transport infrastructure, attracting a large single use employer with the financial ability to remediate the quarry Lands and install the active open space required, would significantly change the nature and character of the town of Blessington.

Solutions Our Proposal Enables

Dunmoy's Big Picture Strategy aims to create a vibrant, healthy community by delivering new homes, improving Blessington's entrance, providing new sporting infrastructure, and creating employment opportunities.

Key benefits of the proposal include:

- ✓ **New Residential Development:** A fully serviced site surrounded on three sides by lands zoned Existing Residential, making it an ideal location for new homes.
- ✓ **Employment Expansion:** Increases land zoned for Employment, enhancing the viability of employment-related activities.
- ✓ **Sports Infrastructure:** New sports fields, parking, and clubhouse facilities on a prime site overlooking the lake, benefiting the community.
- ✓ **Commuter Parking:** New commuter parking to the south of Blessington.
- ✓ **Improved Access:** Safe access to new homes, employment areas, recreation facilities, and the Blessington Lakes Greenway. N81 Upgrades: Addressing dangerous bends, reducing speeds, and enhancing safety for all road users.
- ✓ **Future-Proof Infrastructure:** New road infrastructure to facilitate a future outer ring road or bypass.

This integrated proposal offers substantial benefits for the southern part of the town. The rezoning will promote residential development, correct the current misuse of serviced lands in the Draft LAP, and provide employment, recreational, and sporting facilities, all while upgrading the N81 for improved access and safety.

We strongly recommend these proposals be included in the revised Local Area Plan. We are happy to engage in further discussions and can be contacted via the details on the following page.



DUNMOY

PROPERTIES LIMITED

Contact Details:

Colin McGill
Planning Consultant

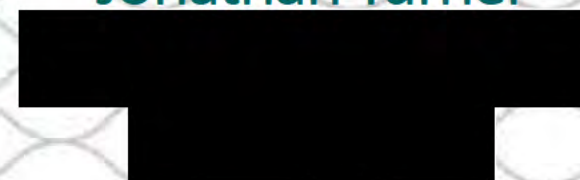
Paul Moran
POGA Consulting Engineers

Ciaran Kennedy
Barrett Mahony Consulting Engineers

Michael Browne
BBA Architecture

Dunmoy Properties Ltd

Jonathan Turner



Crionna Stokes





CENTRE
COORDINATES:
ITM 697180,713253

PUBLISHED:
24/03/2022

ORDER NO.:
50258109_1

MAP SERIES:
1:2,500

MAP SHEETS:
3666-A

Overall Lands under client's control

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bba

architecture

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EMAIL: info@bba.ie

CLIENT:
DUNGREY LIMITED

PROJECT:
ZONING SUBMISSION BLESSINGTON, CO. WICKLOW

DRAWING TITLE:
SITE LOCATION MAP

DRAWING No.
D-127-MAP 1

REVISION:
DATE:
Dec. 2024

DRAWN BY:
LR

CHECKED BY:
MB

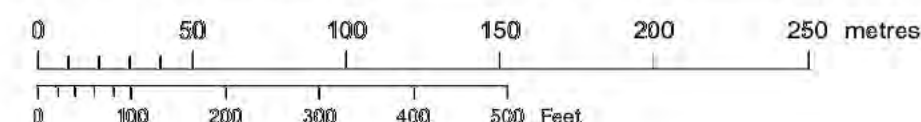
SCALE:
1:2500 @ A2



OUTPUT SCALE: 1:2,500

CAPTURE RESOLUTION:
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resolution at which they were captured.
Output scale is not indicative of data capture scale.
Further information is available at:
<http://www.osi.ie>; search 'Capture Resolution'





OUTPUT SCALE: 1:2,500

CAPTURE RESOLUTION:
The map objects are only accurate to the resolution at which they were captured.
Output scale is not indicative of data capture scale.
Further information is available at:
<http://www.esri.ie>; search 'Capture Resolution'



Overall Lands under client's control

Site 1 - Residential Zoning - 4.36Ha

20 meter set back from plant boundary line

HT A 139.2sq.m (4 beds semi-detached) x4

HT A1 140.4sq.m (4 beds semi-detached side entrance) x4

HT A1 140.4sq.m (4 beds detached side entrance) x2

HT B2 114sq.m (3 beds end of terrace) x1

HT D 138.6sq.m (4 beds semi-detached Backless) x6

HT B 112.7sq.m (3 beds mid terrace) x22

HT B1 112.7sq.m (3 beds semi-detached end of terrace) x31

HT H1 - H2 H1 - 62sq.m H2 - 53sq.m (1 bed mid semi-detached) x20

HT F1 87sq.m (2 beds mid of terrace) x9

HT C 113.5sq.m (3 beds semi-detached Backless) x6

4 No. 2 Bed G.F. Apts

4 No. 3 Bed F.F. Apts

Site 2 - Employment Zoning - 4.03 ha

20 meter set back from plant boundary line

CAFE & ENTERPRISE OFFICE BUILDING

CRECHE

COMMERCIAL / OFFICE BUILDING

LIGHT INDUSTRIAL BLOCK - 12 UNITS

Site 3 - Active Open Space - 3.78Ha

11 A SIDE SOCCER PITCH

5/7 A SIDE SOCCER PITCH

PROPOSED CLUBHOUSE

BIKE ENCLOSURE

REFUSE/SET DOWN/ COLLECTION AREAS

REFUSE ENCLOSURE

PARKING

LEGEND:

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MAP 3

REV DESCRIPTION BY DATE

bba architecture

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CLIENT: DUNGREY LIMITED

PROJECT: MIXED DEVELOPMENT @ BLESSINGTON CO. WICKLOW

DRAWING TITLE: PROPOSED SITE LAYOUT DRAFT

DRAWING No: D-127-MAP 3 REVISION: ----

DRAWN BY: LR CHECKED BY: MB SCALE: NTS @ A1 DATE: NOVEMBER 24

DRAFT ISSUE

ENGINEERING ASSESSMENT

Project Name: Blessington Waste Water Treatment Plant
Land rezoning Assessment

Project No: 22.654

Subject: Space Requirements and future provision assessment

To: Mr Jonathan Turner, Dunmoy Properties Ltd

Prepared By: Barrett Mahony Consulting Engineers

Date / Revision: 05/12/2024

Page: 1 of 20



1. INTRODUCTION

Barrett Mahony Consulting Engineers have been requested by Dunmoy Properties Ltd acting on behalf of Dungrey Limited to assist in a review of the implications of land rezoning proposed by Wicklow County Council, and in particular to assist in assessing the scale of lands as may be required for expansion of the Uisce Éireann Blessington Waste Water Treatment Plant (WWTP). The Blessington WWTP is located to the south of Blessington. The plant abuts the Deerpark Stream on one side and all three other sides is surrounded by lands owned by Dungrey limited and under development by Dunmoy Properties Ltd.

Wicklow County Council as the local planning Authority have proposed a Land Use Zoning Map as part of the draft Blessington Local Area Plan as issued on the 30th of October 2024. This plan includes a large section of land between the Waste Water Treatment Plant and the N81 which is being proposed to Zone as Public Utility ostensibly for parking provision but primarily Dunmoy have been advised to allow for a future expansion of capacity of the waste water treatment plant. We understand this zoning has been proposed and land space allocated by WCC without appropriate formal engagement with Uisce Éireann and without a formal analysis and a detailed assessment of needs by Uisce Éireann.

This report therefore reviews the proposed land included in the Land use Zoning proposal and identified as “Public Utility” and assesses this against the anticipated growth and space requirement to provide a waste water plant of suitable size and capacity utilising modern day waste water treatment processing and technology

2. EXECUTIVE SUMMARY.

Lands at Blessington are proposed to be zoned Public Utility as incorporated into the revised development zoning mapping under preparation by Wicklow County Council.

The proposed land use zoning applies to lands in the ownership of Dungrey Limited and being developed on its behalf by Dunmoy Properties Ltd.

The zoning as currently proposed effectively sterilises part of these privately owned lands, prohibiting development and listing the land to be used for a potential park and ride facility for the town (into which access is not allowed for in the Draft LAP proposal) and ostensibly intended to accommodate an enlarged waste water treatment plant that serves Blessington.

This assessment includes a high level study of the existing waste water treatment plant – its size and the population served and compares this to other waste water treatment plants of similar population Equivalents, both in terms of current capacity and for future provision. This study included numerous other Uisce Éireann / Irish Water Waste Water Treatment Plants in similar situations with discharges to pump stations and / or internal water courses.

The comparison shows that the site area of the existing plant is very generous and underutilised.

Our indicative analysis shows that a significant expansion of the population capacity of the plant

should be manageable within the boundary of the existing site. It is noted there are elements of reconfiguration that could make for a more rationalised layout and efficient space. Accepting that the site is currently underutilised and that would remain as such as part of an increased physical expansion of the plant, we are of the opinion that the proposed land zoning of public utility is far greater than required for any reasonable expansion of the Population of the town of Blessington.

We have set out our findings and comparisons on the attached as follows.

3. FINDINGS

3.1 EXISTING SITE AT BLESSINGTON

The existing Waste Water Treatment plant at Blessington is indicated on Irish Water register as operating with reserve capacity and to cater for a population of 6,000 PE. It has recently gone through an expansion managed by Veolia on behalf of Uisce Eireann and has an expanded capacity of 9000 PE as of 2024.

It is our understanding that Dunmoy Properties Ltd has engaged with the engineer that manages the Blessington Waste Water Plant. This engineer who knows the plant thoroughly has advised our client of the following:

- The current capacity of the plant is 6,000 PE.
- The plant has been physically expanded with additional tanking to a 9,000 PE.
- The sole requirement to utilise the 9,000PE is additional pumping capacity – no additional physical space was required outside the fence line for this expansion.
- The plant has sufficient tank capacity at Stage 1 for up to 15,000PE. This preliminary phase deals with rags and grit. The requirement here would be a capital investment in additional machinery capacity – no additional land would be required.
- At Stage 2 additional settling tanks would be required for up to 15,000PE. These tanks filter water through a series of tanks which would require upgrading in capacity and then use aeration cells which would also need to be upgraded. However the physical land is available within the existing fence line through more optimal use of parking areas and other under utilised areas within the plant.
- The outflow of the plant is via a pumped water main which pumps the grey water to Golden Falls where it outfalls into the river Liffey outside of the Blessington Lakes system (which is used for fresh water supply for Dublin).
- In the opinion of the engineer operating the plant there is sufficient land within the current fence line to support a 15,000 PE.

The site covers an area of 18,800 m² (1.88ha)

The facility is adjacent to the Deerpark river but does not discharge direct, instead discharge is made via a pumped rising main to a remote section of the river Liffey, south of the treatment plant at Golden Falls

The latest census figures for the townland of Blessington shows a population of just over 5,500, compared to a plant capacity of 9,000 already offering some reserve capacity .

Indication as given on IW register 'Green', meaning sufficient capacity available

IW figures are based on 2016 Census Figure giving Blessington Population 5,500

2023 census Figure 5,611, showing negligible growth over 7 years.

Assessment for future growth is based on a very conservatively high positive population growth, allowing Blessington Population was to more than double to 15,000.

3.2 REVIEW OF OTHER SIMILAR SIZED WASTE WATER TREATMENT PLANTS

Our study has reviewed several other waste water treatment plants and compared land area and populations served. It is accepted that such an assessment is not an exact science as there are other variables in site selection and waste water treatment plant design , however this area / PE metric would give a very good indication of the approximate area an efficient waste water treatment plant should take to properly function and treat effluent.

The following WWTPs were reviewed and details are contained in the Appendices of this report. These have been selected as a random spread of waste Water Treatment Plants catering for similar sized populations.

The purpose of the review of WWTPs was to determine;

1. Typical or Average space requirements for WWTPs
2. Comparison of the existing site against the average requirement.

As part of our review it was evident that there was a trend in relation to typical areas per population and that the Plant at Blessington was already a multiple of that rate.

The typical rates for efficient station has been calculated on the basis of the more efficient and common plant designs ignoring the outliers that have an abundance of underutilised land in the vicinity. Plants included in the average figure are marked by an asterisk in the table below.

Image	Location	Area	PE Catered	m ² / PE	Remarks
1	Blessington (existing)	18,800m ²	9,000	2.1m ² /PE	
2	Wicklow WWTP	19,100m ²	34,000	0.5617	*
3	Ballinasloe, Galway WWTP	14,670m ²	9,000	1.63	*
4	Killarney, Co Kerry WWTP	34,127m ²	54,000	0.63	*
5	Longford WWTP	32,000m ²	20,000	1.6	*
6	Castlebar WWTP	26,044m ²	28,000	0.93	*
7	Carrickmacross WWTP	10,766m ²	12,150	0.88	*
8	Clonmel WWTP	56,900m ²	80,000 (Exp capacity to 160,000)	0.711 (0.35)	
9	Mallow, Co Cork WWTP	20,650m ²	22,000	0.938	*
10	Athy WWTP	12,636m ²	15,000	0.8424	*
11	Drogheda WWTP	55,600m ²	101,600	0.547	*
12	Dundalk WWTP	91,350m ²	220,000	0.415	*
	Average existing area utilisation (over 11 sites)	0.88 m ² / PE			

4. ASSESSMENT

The typical area required for a Waste Water Treatment plant is of the order of 0.88m² per PE based on an average of the plants studied in the table above.

This area rate is within a tight range of values presented by the study and not influenced by any notably lower outlier. This is seen as a good comparison and baseline number.

The plant at Blessington already covers an area of 18,800 m².

In theory with an optimal design, reflecting other Irish Water Installations, this should be capable of offering capacity for a population equivalent of $18,800 / 0.88 = 21,360$ PE.

Accepting that a refurbishment would not fully utilise all available space or involve a full reconfiguration or rebuild of the existing plant (such as the PIT area), even with that, a larger rate of area / PE would be expected.

Even at a rate of 1m²/PE this should still be able to deliver 18,800 PE, for a townland that currently has a population of 5,600.

The proposed total area after rezoning is measured at 54,000 m² offers capacity for the population of Blessington to increase to 54,000 Population Equivalent. This is an increase of approximately 9 times the current population. This level of growth provision appears excessive and would not be sustainable in the context of other services or infrastructure.

In the event of such a population increase it would only make sense to utilise the current plant as a pump station and convey waste to a larger remote waste water treatment plant in nearby available land rather than expanding in the confines of already developed lands. It could be noted here that all outfall from Blessington is already pumped to Golden Falls and this pumping infrastructure could be diverted to the much larger Uisce Eireann facility at Ballymore Eustace (which processes fresh water and also waste water).

We appreciate that the Waste Water treatment Plant may require a buffer zone, however this buffer zone can be determined later and does not need to match the same zoning as the municipal water treatment plant.

We trust that this demonstrates that the proposed rezoning is larger than required and in our opinion should be reduced considerably. A scaled back allowance to cater for a more modest population increase would be more appropriate if indeed the council believe the population of Blessington will increase beyond 15,000. If it does not, then no additional land is required around the WWTP. The increase from 18,800m² to 54,000m² is excessive. In our opinion a very minor 20m buffer zone should be sufficient to allow reconfiguration and expansion of the existing with a nominal improved efficiency even if the population were to accelerate so materially.

5. CONCLUSION

The Blessington WWTP does not utilise land within the existing fence line optimally.

The WWTP can be expanded reasonably up to 15,000 PE within the existing zoned area.

If Blessington will not grow beyond 15,000 people (3 times its current population) then no additional land is required to be zoned around the waste water treatment plant.

We have shown that other plants operate with a much more efficient space utilisation.

The Council should engage directly with Uisce Eireann and Dunmoy Properties Ltd to assess what expansion capacity is within the existing fence line of the plant.

The council must then opine on this based on population growth forecasts as to if additional land will be required and or allow for a reasonable set back – say 20m from the existing fence line to allow for future expansion capacity.

In the unlikely – say post 2060 scale of population growth required it, then such a set back of 20m would add an additional 8,000sqm enough land for expansion up to a potential 20,000+ PE – circa 4X the 2023 census population of the town.

6. APPENDICES – AERIAL PHOTOGRAPHS



Image 1
 Existing Blessington Site
 Overall area coverage as measured
 18,800m²
 PE 9,000
 $\text{m}^2/\text{PE} = 18,800 / 9,000 = 2.1\text{m}^2/\text{PE}$

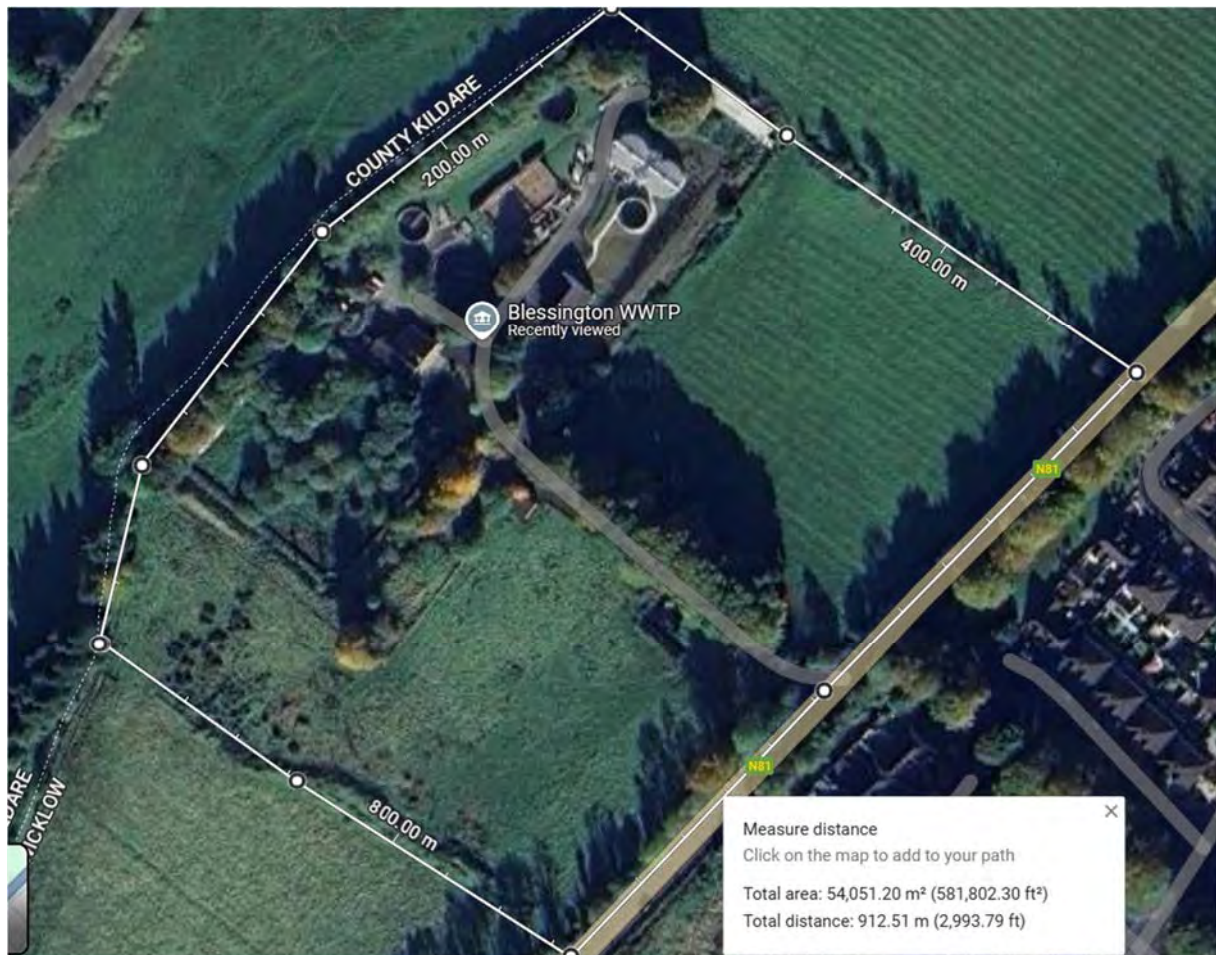


Image 2
 Blessington Site, future scenario including all area rezoned
 Overall area coverage as measured
 54,000m²

PE say increase to 12,000 doubling population
 $\text{m}^2/\text{PE} = 54,000 / 12,000 = 4.5\text{m}^2/\text{PE}$
 (vast increase in rate of m²/PE over already underutilised and inefficient land area)

PE say increase to 20,000 c trebling population
 $\text{m}^2/\text{PE} = 54,000 / 20,000 = 1.7\text{m}^2/\text{PE}$



Image 3
 Wicklow WWTP
 Existing Wicklow WWTP Site
 Overall area coverage as measured
 19,000m²
 Reported PE 34,000
 Status Green
 $\text{m}^2/\text{PE} = 19,100 / 34,000 = 0.562\text{m}^2/\text{PE}$



Image 4
 Ballinasloe, Galway WWTP
 Existing WWTP Site
 Overall area coverage as measured
 14,670m²
 Reported PE 9,000
 Status Green
 $\text{m}^2/\text{PE} = 14,670 / 9,000 = 1.63 \text{ m}^2/\text{PE}$



Image 5
 Killarney, Co Kerry WWTP
 Existing WWTP Site
 Overall area coverage as measured
 34,127m²
 Reported PE 54,000
 Status Green
 $\text{m}^2/\text{PE} = 34,127 / 54,000 = 0.63 \text{ m}^2/\text{PE}$

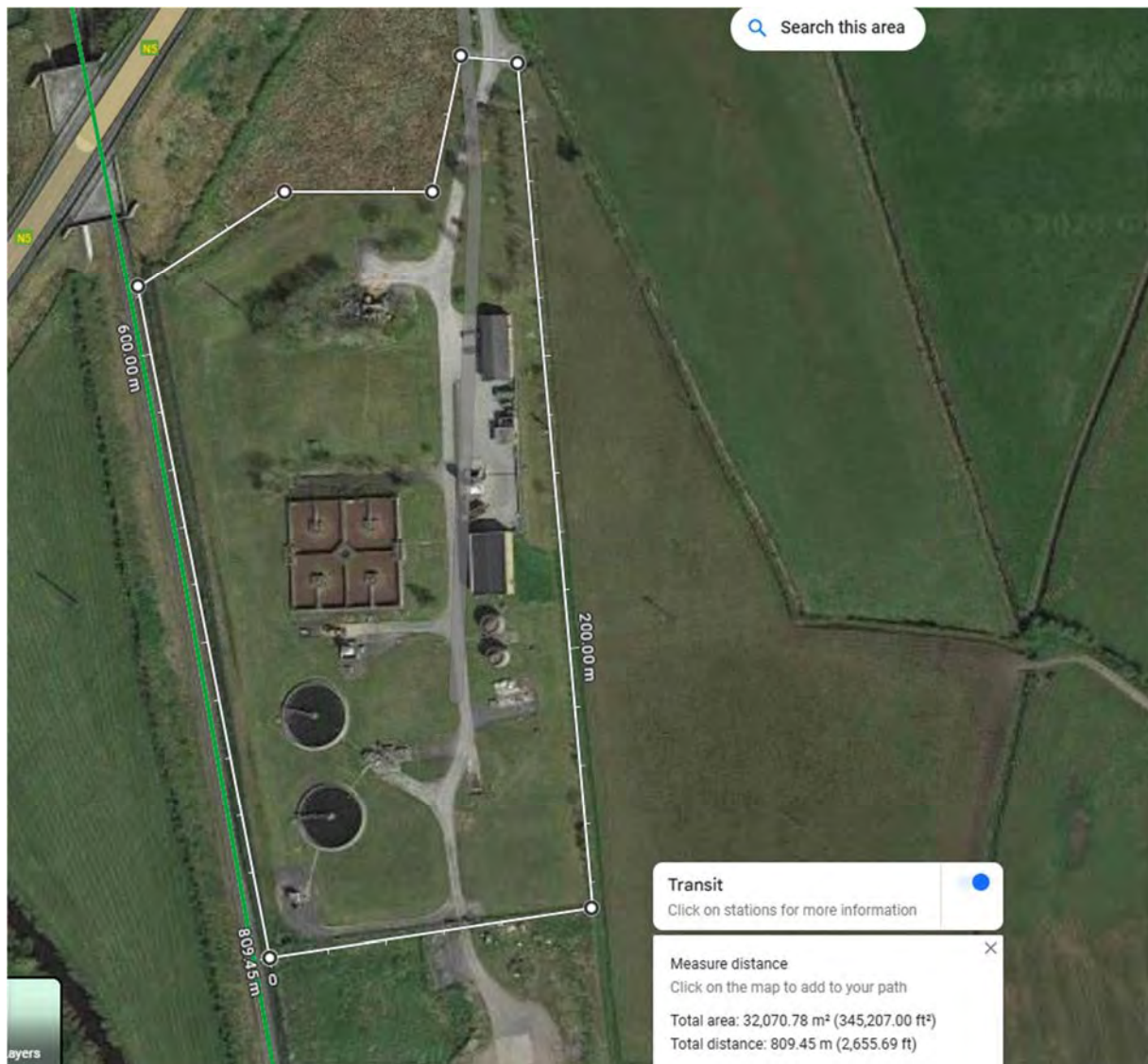


Image 6
Longford WWTP
Existing WWTP Site
Overall area coverage as measured
32,000m²
Reported PE 20,000
Status Green
 $\text{m}^2/\text{PE} = 32,000 / 20,000 = 1.6 \text{ m}^2/\text{PE}$

Note, Definite underutilisation of land.



Image 7
Castlebar WWTP
Existing WWTP Site
Overall area coverage as measured
26,044m²
Reported PE 28,000
Status Green
 $\text{m}^2/\text{PE} = 26,044 / 28,000 = 0.93 \text{ m}^2/\text{PE}$



Image 8

Carrickmacross WWTP

Existing WWTP Site

Overall area coverage as measured

10,766m²

Reported PE 12,150

Status Green

m²/PE = 10,766 / 12,150 = 0.88 m²/PE



Image 9
 Clonmel WWTP
 Existing WWTP Site
 Overall area coverage as measured
 56,900m²
 Reported PE 80,000
 Status Green
 $\text{m}^2/\text{PE} = 56,900 / 80,000 = 07.1 \text{ m}^2/\text{PE}$

Note, Definite under-utilisation of land, capacity to increase to 160,000 note in IW data.



Image 10
Mallow, Co Cork WWTP
Existing WWTP Site
Overall area coverage as measured
20,650m²
Reported PE 22,000
Status Green
 $\text{m}^2/\text{PE} = 20,650 / 22,000 = 0.93 \text{ m}^2/\text{PE}$



Image 11
Athy WWTP
Existing WWTP Site
Overall area coverage as measured
12,636m²
Reported PE 15,000
Status Green
 $\text{m}^2/\text{PE} = 12,636 / 15,000 = 0.84 \text{ m}^2/\text{PE}$



Image 12
 Drogheda WWTP
 Existing WWTP Site
 Overall area coverage as measured
 55,600m²
 Reported PE 101,600
 Status Green
 $\text{m}^2/\text{PE} = 56,000 / 101,600 = 0.55 \text{ m}^2/\text{PE}$



Image 13
 Dundalk WWTP
 Existing WWTP Site
 Overall area coverage as measured
 91,350m²
 Reported PE 220,000
 Status Green
 $\text{m}^2/\text{PE} = 91,350 / 220,000 = 0.41 \text{ m}^2/\text{PE}$

End of Report