

Blessington eGreenway

Response to ABP Submissions

Project number: 60617025

Prepared for:

Wicklow County Council

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1. Introduction

This report provides a response to the submissions and objections made to An Bord Pleanála (“the Board”) in response to an application to An Bord Pleanála (ABP) under Section 177AE of the Planning and Development Act 2000 (as amended) seeking approval for a greenway consisting of approximately 33km of walking and cycling paths that loops around Poulaphouca Reservoir (Blessington Lake) adjacent to farmland and through forest and woodlands (hereafter referred to as the Proposed Development).

An overview of the submissions is provided in Section 1.1. The issues raised in the submissions together with the responses are provided in Section 2. There is a significant degree of overlap between many of the issues raised in the submissions on the Proposed Development. Where the same issue is raised in several submissions, this report a composite response to the issues raised.

1.1 Overview of Submissions Received

A total of 293 submissions were received by ABP. Table 1.1 below provides an overview of the issues raised in the submissions received.

Table 1.1 Overview of Submissions Received

Issue Raised	Approx no. of submissions referencing this issue
1. Traffic lights on existing bridges	239
2. Lack of public consultation	137
3. Toilets (adequacy of provision)	104
4. Traffic impact (during construction and post development)	97
5. Car parking (adequacy of provision for the facility)	94
6. Environment (adequacy of archaeology assessment, adequacy of environmental assessments, impact on wildlife and ecology)	70
7. Fencing	38
8. Impact on trees	25

Other issues raised include:

- Safety, security, and management of the facility.
- Control of dogs.
- Litter disposal.
- Materials proposed for greenway surface.
- Shared use of L8360 road.
- Impacts on car parking in Blessington town.
- Drainage systems.

2. Response to Submissions on Proposed Development

2.2.1 Traffic Lights on Existing Bridges

Summary of Issue Raised

Of the 293-no. submissions 239 (82%) have raised an objection to the proposal to provide traffic lights on the existing vehicular bridges at Knockiernan, Vallemount and Baltyboys. The basis of the objections involves the following:

- The traffic counts were undertaken at a time when traffic volumes were lower than usual due to Covid pandemic.
- Requiring motor vehicles to stop at traffic lights will create traffic congestion, inconvenience, unacceptable delay and increase air pollution.
- The width of the traffic lane proposed will impede emergency vehicles and agricultural vehicles.
- Traffic lights are not appropriate in a rural area.
- Traffic lights leaves drivers vulnerable to attack/car hijacking.

Response to Issue Raised

The National Investment Framework for Transport in Ireland (NIFTI) is the Department of Transport's high-level strategic framework to support the consideration and prioritisation of future investment in land transport. NIFTI outlines transport planning will prioritise sustainable modes and sets out a hierarchy of travel modes. The framework encourages the use of active travel and public transport ahead of solutions reliant on private transport. Maintenance or optimisation of existing assets, including through demand management, is also preferred to extensive enhancements or outright new infrastructure. This is reflected in the intervention hierarchy and modal hierarchy outlined in NIFTI (See Figure 2.1).

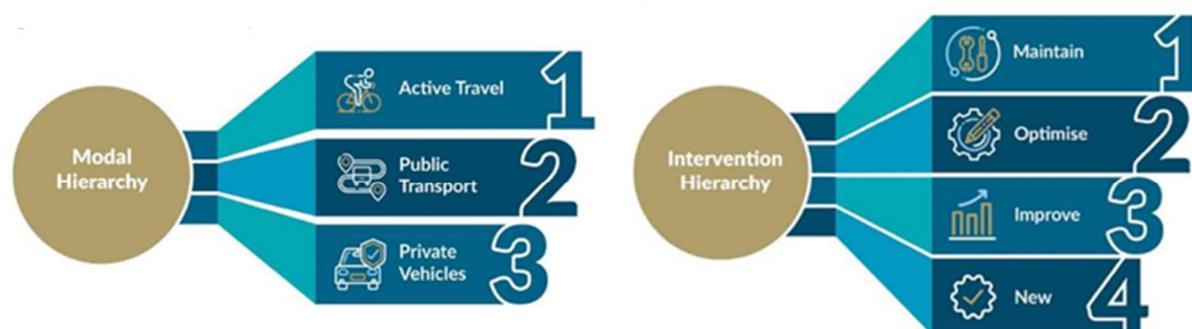


Figure 2.1 Modal and Intervention Hierarchy from NIFTI

The Proposed Development involves prioritising active travel as required by the modal hierarchy. The Proposed Development involves maintaining and optimising the existing bridges rather than new infrastructure as required by the intervention hierarchy. It can therefore be concluded that the proposal for the existing bridges is consistent with NIFTI which is the high-level strategic framework to support the consideration and prioritisation of future investment in land transport. The provision of a new bridge or the introduction of more expensive boardwalk solutions as suggested is inconsistent with intervention hierarchy and modal hierarchy outlined in NIFTI.

The continued assumption of growth in private vehicle usage is not sustainable and is contrary to the targets contained within Smarter Travel (2009). The Design Manual for Urban Roads and Streets highlights the issue of 'updesigning', where roads are designed to standards more than their movement function. Updesigning also places a significant financial burden (both capital and maintenance) on local authorities. These outcomes represent poor value for money and a simpler, more integrated approach can achieve advantages in terms of sustainability, placemaking and traffic movement. Government policies require a shift away from conventional design solutions toward those

which prioritise sustainable modes of transport, safeguard vulnerable users and promote a sense of place. The approach required to achieve these outcomes will be principally based the application of a more integrated model of street design, where real and perceived barriers to movement are removed to promote more equitable interaction between users in a safe and traffic calmed environment.

Traffic Surveys

Traffic surveys were obtained at the Knockiernan, Valleymount and Baltyboys bridges between Tuesday May 4th May and Wednesday 19th May 2021. Travel restriction associated with the Coronavirus pandemic were implemented by government in March 2020. In February 2021, the government-imposed testing and quarantine rules on incoming travellers. The lockdown was gradually lifted from May 2021, but indoor hospitality remained shut.

Infections rose again in July 2021 due to the Delta variant. Indoor hospitality reopened under strict rules, while vaccinations sped up. Despite Ireland's high vaccination rate, there was another surge in late 2021 due to the Omicron variant, with record-breaking cases being reported. Proof of vaccination or non-infection became mandatory to enter most indoor venues, but the government imposed another curfew on indoor hospitality from 20 December 2021. Cases fell sharply, and most restrictions, including mandatory mask wearing and social distancing, were eased in January and February 2022.

Additional traffic counts were undertaken on the 26th of July 2022 and further surveys were undertaken on the 3rd May 2023. The traffic surveys undertaken in 2021, 2022 and 2023 are outlined in the below.

Table 1.2 Traffic Surveys in AM Peak (09:00 – 10:00)

Location	2021 Survey	2022 Survey	2023 Survey
Knockiernan Bridge (2-way traffic flow)	195	167	168
Valleymount Bridge (2-way traffic flow)	140	153	131
Baltyboys Bridge (2-way traffic flow)	162	78	151
Total	497	398	450

Notwithstanding the concerns outlined in the submissions to An Bord Pleanála the conclusion is that the data presented in the original reports is still valid and relevant.

Traffic Congestion, Delay, or Inconvenience

The traffic analysis undertaken as part of the original planning submission concludes the introduction of traffic lights will not result in traffic congestion. While the traffic lights may require private vehicles to stop this will not result in unacceptable delay or inconvenience. It is worth nothing the proposed length of time for the traffic signals to turn green is proposed not to exceed 2 minutes and thus the actual delay or inconvenience is not considered to be excessive. It is not anticipated the Proposed Development will result in unacceptable air pollution. The Proposed Development will support active travel which has been shown to contribute to improved physical and mental health. The potential benefits associated with the Proposed Development are considered to more significant than the potential disbenefits associated with traffic congestion, delay, and inconvenience for private vehicles.

Width of Traffic Lanes

The width of traffic lanes proposed is 3.25m. This width provides sufficient distance for vehicles to pass including larger vehicles such as buses. The Road Safety Authority published 'Guidelines on Maximum Weights and Dimensions of Mechanically Propelled Vehicles and Trailers including Manoeuvrability Criteria' in November 2023 (page 19 of this document the maximum widths). This document identifies the maximum width of an agricultural trailer at tractor is 2.55m wide. It also identifies self-propelled agricultural machinery can be wider than 3.5 metres so long as when travelling on public roads it has an escort vehicle, flashing amber beacons and a "CAUTION – WIDE LOAD FOLLOWING" sign. The height of the kerb separating the active travel facility and the traffic lane is proposed to be approximately 125mm high. As a result, it will be possible for wide agricultural machinery to pass with the support of the traffic management procedures.

Some concerns were outlined in the submissions that the introduction of traffic signals and/or the width of traffic lanes will impede the response of emergency vehicles. Emergency vehicles encounter traffic signals across the road network. Traffic lanes with lower widths are used by emergency vehicles across the road network. The blue light is activated to support the response of emergency vehicles. As a result, the proposals are not considered to have a negative impact on emergency vehicle response and on balance the width of the traffic lanes is considered appropriate as it provides dedicated facilities to support active travel users who are the most vulnerable road user type. The proposals support the anticipated everyday users while also accommodating the occasional requirements from larger vehicles.

Appropriateness of Traffic Signals in a Rural Area and Risk of Car Hijacking

While it is considered reasonable to say traffic signals are usually provided in urban settings, they are also deployed in rural settings where required. While it is understandable that there would be some concern about the introduction of traffic signals the risk of car hijacking is not considered a sufficiently strong reason to avoid the introduction of traffic control.

Similar examples involving traffic signals in other locations include:

- Inniscarra Bridge Co. Cork.
- Kildangan Bridge Co. Kildare.
- R415 Rathbride Road Co. Kildare.
- Slane Bridge Co. Meath.



Figure 2.2 Traffic signals at Kildangan Bridge Co.Kildare

Traffic signals are proposed for this project as they will provide a method of traffic control to support the introduction of dedicated facilities for active travel users. Policy support is clearly contained in the modal and intervention hierarchy contained in the National Investment Framework for Transport in Ireland.

2.2.2 Public Consultation

Summary of Issue Raised

The submissions refer to insufficient public consultation with residents, landowners and businesses affected by the project.

Response to Issue Raised

A report prepared by Wicklow County Council, titled “**Response to An Bord Pleanála RFI Item 12 - Public Consultation and Communication**,” dated January 2024. This comprehensive document outlines the details of the consultations and communications conducted during the project.

2.2.3 Toilet Facilities

Summary of Issue Raised

The submissions highlight the absence of proposed toilet facilities within the Proposed Development on the route.

Response to Issue Raised

Blessington town will serve as the primary trailhead for the route. Public toilet facilities already exist in the town and there are plans for additional toilet facilities at the proposed Blessington Hub. The Blessington Hub, a new greenway facility to be developed by Wicklow County Council, will feature a permanent Tourist Office, community meeting room/classroom, and a changing places facility. The design also envisions incorporating the history of the lakes into the building.

Furthermore, amenities and facilities, including toilets, are available in the nearby settlements along or adjacent to the route. The promotion of these amenities within these settlements is expected to foster interaction with the greenway's development, contributing to the support of local economies.

2.2.4 Traffic Impact

Summary of Issue Raised

The submissions outline the traffic impacts of the proposed development will be significant.

Response to Issue Raised

A “**Transport and Traffic Assessment**” report, dated December 2023, has been prepared in response to ABP RFI Item 3. Detailed and updated traffic surveys were conducted in 2023 and the report prepared examines the potential impacts associated with the operation of the development, in relation to traffic and transportation. The assessment concludes that the road network can satisfactorily accommodate the increase in traffic associated with the proposed development.

2.2.5 Car Parking Provision

Summary of Issue Raised

The submissions outline the proposed car parking provision is insufficient.

Response to Issue Raised

A “**Transport and Traffic Assessment**” report, dated December 2023, has been prepared in response to RFI Item 3. Detailed and updated traffic surveys were conducted in 2023 and the report prepared examines the potential impacts associated with the operation of the development, in relation to traffic and transportation including car parking. The assessment concludes that the road network can satisfactorily accommodate the increase in traffic associated with the proposed development.

2.2.6 Environment

2.2.6.1 Special Protection Area

Summary of Issue Raised

There is no definitive line on any of the submitted drawings to indicate the boundary of the SPA. It is therefore impossible to tell where the proposed eGreenway encroaches on the SPA. The Proposed Development will encroach on and into the Special Protection Area this is conceded on Page 31 of the Ecological Impact Assessment report which forms part of the application. See Table 2, Page 31. EIA Report. Distance to designated Site. The nature and extent of the encroachment is impossible to calculate from the information provided in the application document.

Response to Issue Raised

The existing Blessington Greenway involves encroachment into the Special Protection Area. The Proposed Development involves encroachment into the Special Protection Area. This is required to provide erosion protection measures, water crossing facilities and to minimise the loss of trees. The encroachment is identified on drawings:

- 60617025_SHT_DD_BLGWY_101.1
- 60617025_SHT_DD_BLGWY_150.1,
- 60617025_SHT_DD_BLGWY_150.2,
- 60617025_SHT_DD_BLGWY_150.3,
- 60617025_SHT_DD_BLGWY_150.4.

Further details on the areas associated with location in the table:

Table 1. Encroachment into SPA (Refer to drawing numbers above for locations)

Location No.	Area (m²)	Comment
1	1297	Erosion protection
2	496	Erosion protection
3	2340	Erosion protection
4	265	Water crossing
5	300	Erosion protection
6	3491	Erosion protection
7	16	Erosion protection
8	62	Routing to for reduced tree impact
9	15	Location of existing facility
10	379	Location of existing facility
11	1375	Location of existing facility
12	109	Location of existing facility

2.2.6.2 *Impact on Birds*

Summary of Issue Raised

The site is a Special Protection Area (SPA) under the EU Birds Directive, of special conservation interest for the following species: Greylag Goose and Lesser Black-backed Gull” (Site Synopsis, NPWS). These species overwinter at this site. Construction works are likely to cause disruption to these species, which are listed under Annex I of the EU Birds Directive.

Response to Issue Raised

A detailed review of existing bird data was undertaken. National Parks and Wildlife Service and Birdwatch Ireland were consulted regarding these protected species. It should be noted that surveys of Greylag Goose populations have shown that this species does not utilise the portion of the reservoir south of Blessington Bridge. There is therefore no potential for this species to be impacted upon by the proposed works. As much of the proposed route will not be located on shoreline of reservoir, disturbance arising from operational impacts of the Greenway were not considered significant. Potential significant impacts from construction activities were identified. Mitigation measures to address these have been drawn up as part of the Appropriate Assessment process for this project. In addition to this, the suite of mitigation measures as described in the Ecological Impact Assessment will avoid potential impacts on these species.

Shoreline vegetation is to be retained where possible. This will allow for a visual screen to be retained. Disturbance potential for the above birds is highest when roosting and foraging areas are affected. Therefore, care will be taken to ensure that all these areas are identified, and disturbance of these areas is prevented. Further species-specific surveys will be carried out to identify same.

Works activities will not occur over the wintering period within one hour after dawn, and one hour before dusk. Regular roost monitoring will be undertaken when works are within 1km of identified roost areas, to ensure works are not having a negative impact on roosting birds.

Areas of high foraging intensity of Greylag Geese will also be identified if occurring, and these flocks should be monitored regularly to ensure works are not having an adverse effect on bird foraging behaviour. If impacts on roosting or foraging behaviour are identified, possible additional mitigation measures may be required, including screening works with a barrier to assist in noise transmission, and reducing works hours. Monitoring of works and the target species is to be carried out during first six weeks of works in order to record any impacts on these species. If significant disturbance to these species is noted, works practices shall be reviewed in consultation with the above bodies.

2.2.6.3 Impact on Other Species

Summary of Issue Raised

While much consideration has been given to the bird life in the area *Margaritifera margaritifera*, the freshwater pearl mussel, a protected species (EU Habitats Directive Annex II, V and Irish Wildlife Acts) and is not mentioned at all in the documentation supplied. The Liffey and Kings River catchments, which are part of the Blessington Lake are listed as *Margaritifera* sensitive areas by NPWS. Shell evidence of the pearl mussel and claws of the freshwater crayfish (*Austroptamobius pallipes*) are common along the shoreline at Ballinastockan.

Their status is recorded by National Parks & Wildlife Service 2019 unpublished report- The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. In keeping with the purpose of the greenway the aim of the development must be to enhance the environment and quality of life of the area not to deteriorate it or impact negatively on it. Do we need a full Environmental Impact Statement for the Greenway?

Response to Issue Raised

The area under survey is not within a *Margaritifera* sensitive area. No suitable habitat for this species occurs within the area under survey. No in-stream works on any watercourse are planned. No impacts to this species may be expected. Suitable habitat exists for White-Clawed Crayfish. No works will take place within the aquatic areas of the reservoir. Mitigation has been described to ensure that water quality and aquatic species will be protected. The presence of other protected species within the area under survey is noted. These species were considered in the devising of the Ecological Impact Assessment and other assessments. An Environmental Impact Assessment screening was undertaken. This determined that an Environmental Impact Assessment Report was not required.

2.2.6.3 Habitats Directive

Summary of Issue Raised

Blessington Lakes and the surrounding lakeside areas including Poulapuca have areas of SPA (Special Protection Area) that legally cannot be breached by Greenway construction. I note the NPWS (National Parks and Wildlife Service) has not produced site specific conservation objectives for the Poulaphuca SPA. Because of this it is not possible for An Bord Pleanála to appropriately assess the implications of this greenway project for the site proposed conservation objectives. This is required Article 6(3) of the Habitats Directive.

Response to Issue Raised

Generic Conservation Objectives were available for Poulaphuca Reservoir SPA at time of writing. The European Commission advises that in such cases the appropriate assessment should assume as a minimum that an objective is to ensure that species are not significantly disturbed. This was used to guide the assessments carried out. It was determined that no significant disturbance to species may be predicted with the proper implementation of mitigation measures as set out in the NIS.

2.2.6.4 Archaeology

Summary of Issue Raised

Unclear whether the Archaeology Impact Assessment was prepared by a suitably qualified and experienced archaeologist.

Response to Issue Raised

Document was prepared by a professional archaeologist with suitable qualifications and over 20 years' experience.

Summary of Issue Raised

No reference made to the high potential for underwater/reservoir foreshore archaeological remains to survive along the shore and in the area of the proposed bridge crossings.

Response to Issue Raised

The location is on the edge of a manmade reservoir within a belt of ground planted by ESB. While there is potential for terrestrial / submerged terrestrial archaeological features, the area has been previously disturbed by the tree planting and no works are planned in the water. All recorded archaeological sites within 100m of the Proposed Development have been noted and those within proximity highlighted.

Summary of Issue Raised

No detailed archaeological strategy and programme of archaeological mitigation measures is provided to ensure the protection of archaeological heritage (both terrestrial and underwater archaeological features). A detailed archaeological strategy should be developed and submitted to the National Monuments Service for agreement well in advance of any site preparation and/or construction works and preferably in advance of any planning decision.

Response to Issue Raised

The previous assessment in 2015 recommended that, given the limited impacts required for the track and the previous ground disturbance within the forested margin, archaeological monitoring rather than testing should take place. This archaeological monitoring should take place at the number of areas of high archaeological potential due to the significance of the archaeology and the potential for further finds. These areas of high archaeological potential relate to the recorded archaeological assets within the immediate proximity of the Proposed Development. The current assessment concurred with these recommendations and proposed that mitigation should take the form of constant archaeological monitoring within the vicinities of the following recorded archaeological assets:

- assets associated with the medieval borough of Burgage More (WI005-07001-016);
- wedge tomb (WI010-062) at Carrigacurra;
- enclosure (WI010-019) at Ballyknockan
- ringfort (WI010-018) at Ballyknockan;
- moated site (WI005-078) at Carrig;
- mill site (WI005-078) at Burgage More; and
- Neolithic house (WI010-058) at Boystown/Baltyboys Upper.

It is further recommended that the following mitigation take place at the sections of the Proposed Development at Vallemount and the car parks at Knockieran and Russborough:

- The existing stone walls, steps and paths should be subject to record by photograph and written description prior to construction works within this area;
- The tunnel to Russborough House (4256) should be subject to record by photograph and written description prior to conversion to an access as part of the Proposed Development;
- Archaeological testing take place within the Knockieran car park area proposed for tree planting prior to construction works within this area;
- Archaeological testing take place within the Burgage Area proposed for tree planting prior to construction works within this area;
- Archaeological testing take place within the Avon Area proposed for tree planting prior to construction works within this area;
- The Cross Inscribed stone (WI010-048) and Ballyknockan Ruin / Biddy Mulvey's Cottage (RPS ref 10-5) should be noted to all contractor staff. Care should be taken to avoid accidental impact during adjacent works. The Cross Inscribed stone (WI010-048) should be demarcated with barrier tape if practical.
- The memorial erected post February 2018 should remain in situ with care taken to ensure no accidental impact during the works;
- Groundworks associated with construction accesses and works compounds within Greenfield be subject to constant archaeological monitoring;

- Groundworks associated with the extension of Knockieran car park be subject to constant archaeological monitoring; and
- Groundworks associated with the extension of Russborough car park be subject to constant archaeological monitoring.

Summary of Issue Raised

The developer should have regard to the archaeological policy of the Department of Culture, Heritage & the Gaeltacht as outlined in our policy document entitled "Framework and Principles for the Protection of the Archaeological Heritage", (1999) and summarised below.

With regard to the preservation in-situ of archaeological remains, it is stated in our policy document that "there should always be a presumption in favour of avoiding developmental impacts on the archaeological heritage. Preservation in-situ must always be the preferred option to be considered rather than preservation by record in order to allow development to proceed, and preservation in-situ must also be presumed to be the preferred option."

It should also be noted that "if preservation by record is to be applied the developer must accept responsibility for the costs of archaeological excavation to the extent necessitated by the development. Such costs include those arising from the preparation of a report on the excavation".

Response to Issue Raised

The Proposed Development will not directly impact upon recorded archaeological remains. Given the limited impacts required for the track and the previous ground disturbance within the forested margin, the AIA recommended that archaeological monitoring rather than testing should take place. This archaeological monitoring should take place at the number of areas of high archaeological potential due to the significance of the archaeology and the potential for further finds. These areas of high archaeological potential relate to the recorded archaeological assets within the immediate proximity of the Proposed Development. Any previously unrecorded archaeological remains uncovered by groundworks will be preserved by record. The client will accept responsibility for the costs of archaeological excavation to the extent necessitated by the development.

Summary of Issue Raised

The current County Wicklow Development Plan includes the following objectives relating to the protection of the archaeological heritage which are relevant to this proposed development:

BH1 – No development in the vicinity of a feature included in the Record of Monuments and Places (RMP) will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.

BH2 – Any development that may, due to its size, location or nature, have implications for archaeological heritage shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the "preservation in situ" of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a competent archaeologist.

Response to Issue Raised

BH1 – No development in the vicinity of a feature included in the Record of Monuments and Places (RMP) will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.

The RMP features within the vicinity of the Proposed Development are either located within the forested belt, on the foreshore or submerged in the reservoir. The majority are currently not accessible to the public. The Proposed Development will entail a limited footprint within the forested belt which will not detract from the settings of these assets. Additionally, the Proposed Development will allow improved access to the site locations on the shoreline and forested belt which will increase public knowledge of the assets thereby providing a better understanding of the history of the area.

BH2 requirement for archaeological assessment with the Planning Authority requiring the developer to have the site works supervised by a competent archaeologist.

The recommendations within the AIA state that specific siteworks should be supervised by a competent archaeologist.

Summary of Issue Raised

While the existing plan for the greenway has identified some of the archaeology sites and locations, they have ignored other major sites which are recorded but don't show up in greenway study. There will need to be further archaeological study before the work is carried out.

Response to Issue Raised

The Archaeological Impact Assessment was prepared using publicly available sources and also utilised an existing report prepared by the Moore Group (2015). The Proposed Development will involve the creation of a path through an area already planted. It will entail limited ground disturbance and, from this, a study area of 100m was determined as appropriate. All recorded archaeological assets were noted within this with appropriate mitigation measures recommended where deemed necessary. Sites outside the 100m study area are not discussed.

Summary of Issue Raised

Insufficient care is being taken to identify and preserve the local archaeological heritage. Two sites which have been reported to the National Monuments Service and National Museum which should be noted for mitigation and archaeological monitoring.

Site 1. Large saddle quern scatter at Baltyboys. Also beehive quern and Late Bronze Age spear mould in the same approximate location.

Site 2. Baltyboys – flint knapping site and 3 polished stone axes.

Response to Issue Raised

The two sites are not recorded on the RMP or National Museum online datasets and have been highlighted through post-planning local knowledge. This knowledge is welcomed, and the AIA will be updated to take account of these sites.

The Archaeological Impact Assessment recommends that archaeological monitoring should take place at the number of areas of high archaeological potential due to the significance of the archaeology and the potential for further finds. These areas of high archaeological potential relate to the recorded archaeological assets within the immediate proximity of the Proposed Development. It should be noted that the Proposed Development will only run adjacent to Site 1 of the new sites. The proposed mitigation within the Archaeological Impact Assessment will be modified to state that constant archaeological monitoring will be required during the works within the vicinity of Site 1.

2.2.7 Fencing

Summary of Issue Raised

The submissions identify the need for suitable fencing. Issues with protection of animals and potential interaction with users of the Greenway were raised.

Response to Issue Raised

Wicklow County Council envisions that the majority of existing fencing along the route of the proposed eGreenway will remain unaltered. This commitment is rooted in preserving the landscape while ensuring the safety of both the public utilising the greenway and local livestock.

To achieve this, the Council is dedicated to engaging with the ESB, the majority landowner, and adjoining landowners along the greenway. This engagement will involve a case-by-case review of boundaries to understand each individual stakeholder requirements and with reference to the existing provision. The primary goal is to prevent trespassing and create a secure environment for all stakeholders.

In this endeavour, Wicklow County Council will ensure boundary treatments will adhere to the "Code of Best Practice for National and Regional Greenways." This commitment ensures that the greenway's development aligns with established standards for boundary treatment and fencing, reflecting a responsible and community-centric approach.

The decision-making process regarding any new fencing will be collaborative and flexible. Wicklow County Council, in consultation with individual landowners, will determine the type and extent of any new fencing on a case-by-case basis. This tailored approach recognises the unique characteristics of each property and will seek to foster cooperative decision-making.

For guidance, the Council will draw upon fencing types already established by the Transport Infrastructure Ireland (TII). These types, exemplified by the standard Timber Post and Rail Fence (CC-SCD-00301), can be explored on the TII publications website at www.tiipublications.ie.

2.2.8 Trees

Summary of Issue Raised

The submissions relating to trees refer to the number of trees to be removed because of the project and the impact this will have on wildlife and the environment.

Response to Issue Raised

Many of the trees that are proposed to be removed are non-native species and occur within commercial plantations that were not planted for the purposes of supporting biodiversity. Indeed, some of the non-native plantations would have a negative impact upon native species. Each of the trees to be lost will be replaced by native broadleaved trees. These will be of much higher biodiversity value than the non-native trees that are to be lost. Native trees planted (depending on species) will flower and produce fruit within 2-5 years of planting. The biodiversity value of these trees will increase each subsequent year.

Wicklow County Council propose to replace each tree on a 'one for one' basis with native trees. An Arboricultural Survey and Assessment concluded that approximately 7,265 trees will be required to be removed to facilitate the greenway, the proposal replaces those trees in the following manner: Wicklow County Council is committed to and will undertake the planting, on average, one native tree every 10 meters along the main route of the Greenway that is located on ESB lands, where the conditions allow. This would result in the planting of approximately 2300 native species trees as outlined in Table 2.6.1 below.

Location	No. of Trees per 100 meters	Length (m)	Estimated No. of Trees for Replanting
Along Route	10	23,000	2,300
Total			2,300

Table 2.6.1 - No. of Trees to be planted along Route

Wicklow County Council has identified other parcels of land in their ownership that directly adjacent to or close to the Blessington eGreenway which are suitable for replanting purposed and has given the commitment to replant these areas with native species trees. This would result in the planting of approximately 4,965 trees as outlined in Table 2.6.2. See Figure 2.2, 2.3, 2.4, 2.5, 2.6

Location	No. of Trees per 100 Square meters (m2)	Area (m2)	Estimated No. of Trees for Replanting
Knockieran	25	4,490	1,122
Burgage	25	3,025	756
The Avon (Area 1)	25	5,500	1,375
The Avon (Area 2)	25	6,850	1,712
Totals		19,860	4,965

Table 2.6.2 - No. of Trees to be planted on Wicklow County Council Lands

In addition to the areas above Wicklow County Council has identified other parcels of land within ESB ownership that have suffered from wind damage. Subject to agreement with ESB Wicklow County Council proposes replanting of these areas with native species trees. This would result in the planting of an addition 3,300 tree. The areas that have been identified which have suffered from wind damaged are primarily located along the eastern edge of the Greenway between Valleymount and Lacken details can be found in Table 2.6.3 below.

Location	No. of Trees per 100 Square meters (m2)	Area (m2)	Estimated No. of Trees for Replanting
1	25	4,300	1,075
2	25	800	200
3	25	300	75
4	25	900	225
5	25	1,000	250
6	25	2,900	725
7	25	600	150
8	25	700	175
9	25	600	150
10	25	1,100	275
Totals		13,200	3,300

Table 2.6.3 - No. of Trees to be planted on ESB Lands

Also given the commitment that they will, following consultation with the ESB, to plant other suitable areas of ESB land that may be identified during the project with native species trees.

Wicklow County Council has committed to and will replace every tree lost in the delivery of this greenway on a 'one for one' basis and has demonstrated that this can be achieved by planting adjacent to the greenway and utilising Wicklow County Council owned lands.

Over and above the replanting of approximately 7265 trees, Wicklow County Council has also identified other potential areas of land within ESB ownership that have suffered from wind damage that Wicklow County Council will commit to planting with native species trees. The location map of these areas can be found below.

LOCATIONS OF TREE REPLANTING (ON COUNCIL LANDS)

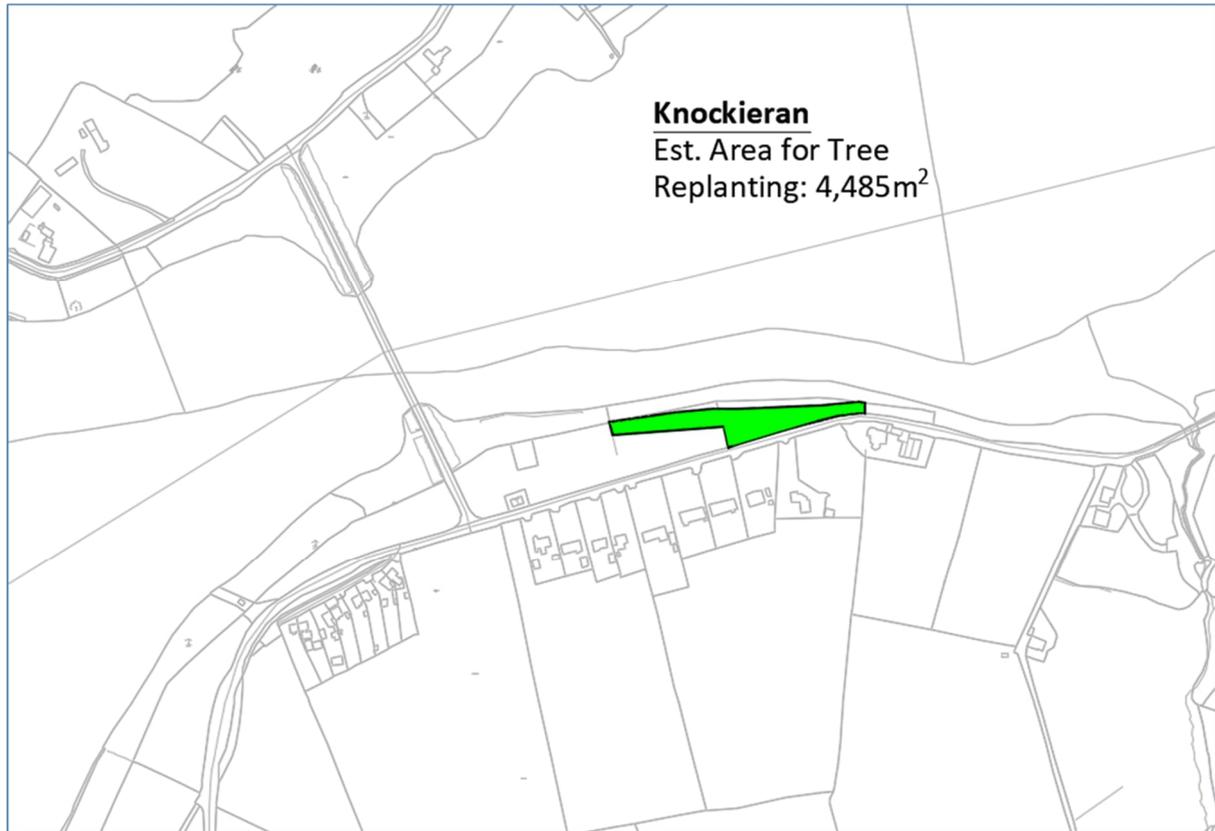


Figure 2.2 Tree Planting at Knockieran

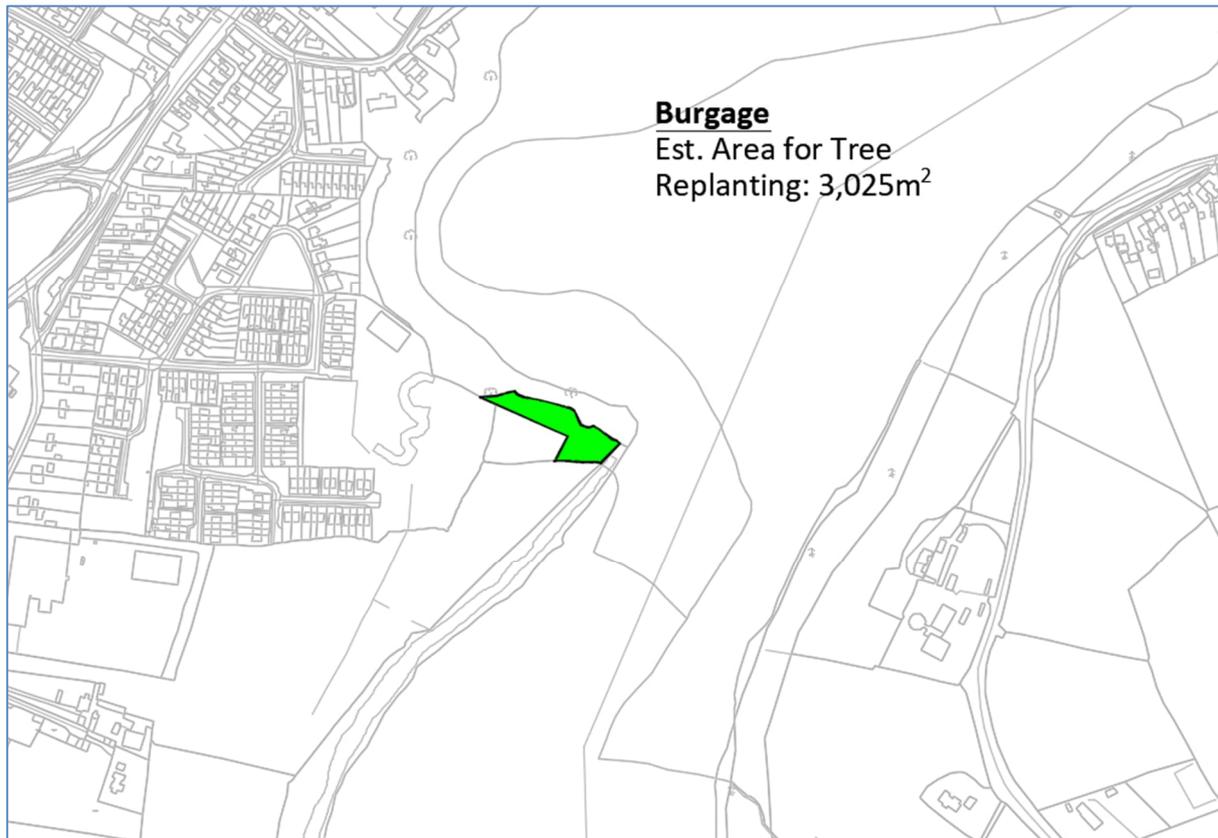


Figure 2.3 Tree Planting at Burgage

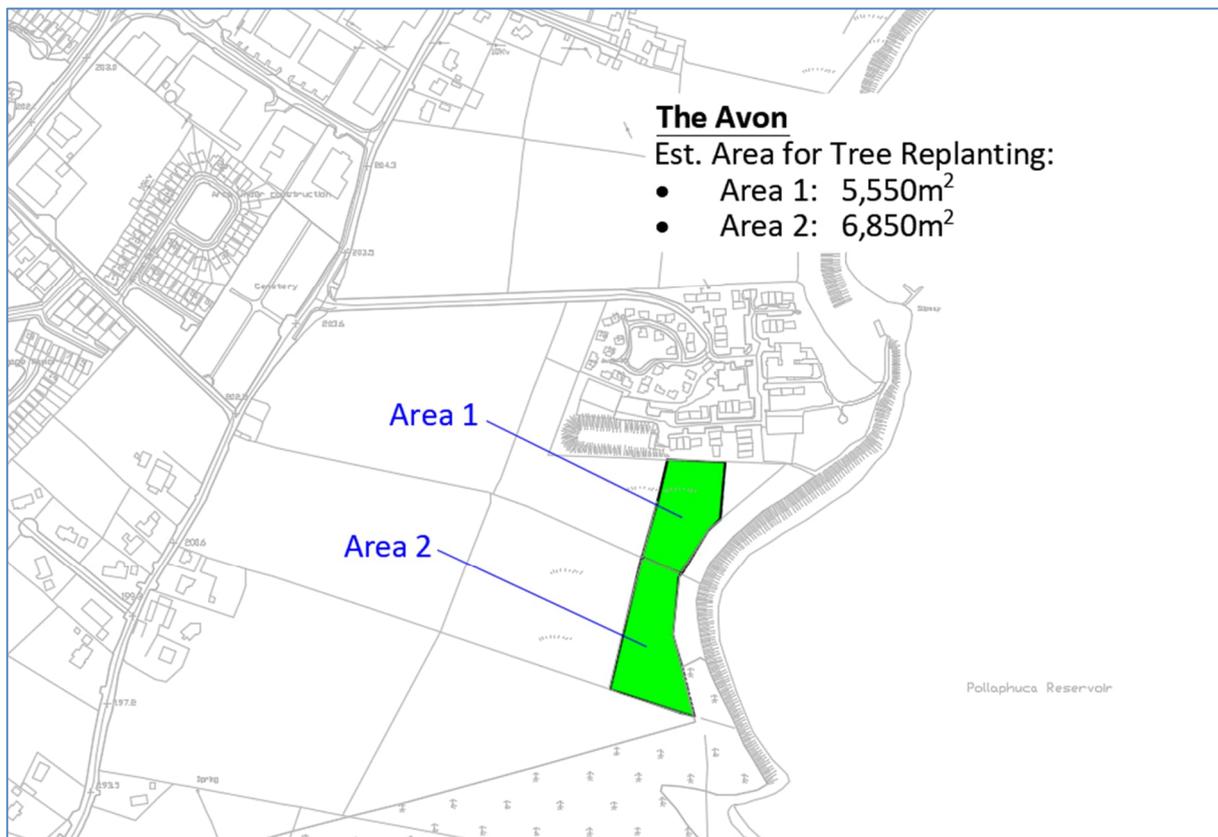


Figure 2.4 Tree Planting at The Avon

LOCATIONS OF WIND DAMAGED AREAS (ON ESB LANDS)

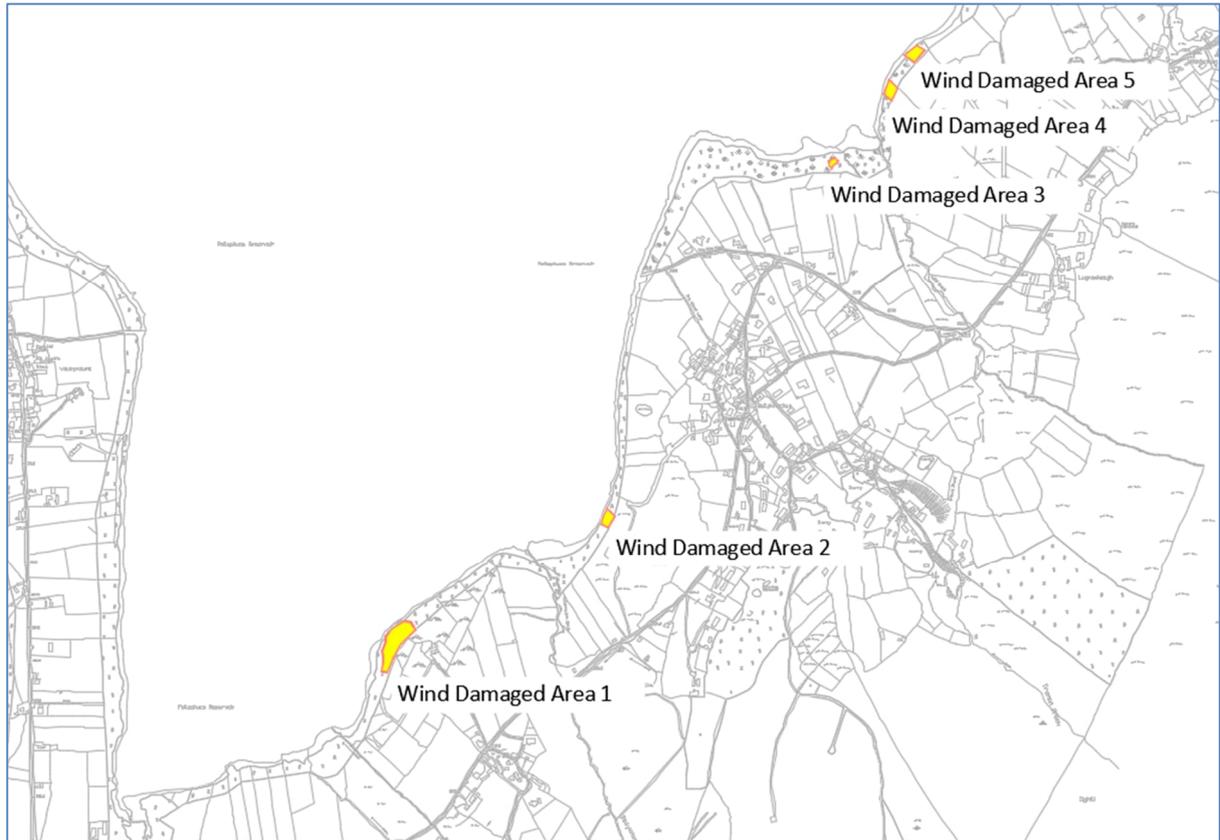


Figure 2.5 Wind Damaged Areas to be Replanted



Figure 2.6 Wind Damaged Areas to be Replanted

2.2.9 Other Issues

2.2.9.1 Visual amenity

Summary of Issue Raised

The use of rock armour around the lake to prevent erosion will have detrimental effects to the visual amenity of the area. It is this visual amenity that will attract tourists and locals to the Greenway. To negatively impact this with intrusive infrastructure that has no sympathetic aesthetic qualities to the landscape would be a mistake.

Response to Issue Raised

The Poulaphouca Reservoir is a man-made structure. The water level of the reservoir is regularly changing, which affects the stability of the shoreline resulting in erosion. As stated in Section 2.9 – Erosion Protection Measures, of the Design Statement, there is existing rock armouring placed at various locations along the shoreline to reduce the impact of shoreline erosion. Additional protection measures are required along other parts of the shoreline to prevent further erosion and to protect the Proposed Development.

A landscaping plan titled “**Blessington Lakes eGreenway Landscape Plan**” has been prepared. The report details the landscape plan and management and maintenance actions necessary to protect and enhance the landscape and biodiversity along the eGreenway. It provides detail on planting species mix for each of the landscape typologies identified along the route. The management and maintenance actions described within the plan describes the maintenance required to allow the proposed planting treatments to flourish and reach their design potential and outlines the maintenance operations required after completion of the planting works and provides a framework for the long-term management of the scheme. The plan has been developed with reference to the All Ireland Pollinator Plan (AIPP) 2021-2025.

2.2.9.2 Safety, security, and management of the facility.

Summary of Issue Raised

Without appropriate safety, security, and management of the facility the Proposed Development introduces risk to personal safety and security.

Response to Issue Raised

An “Outlined Maintenance and Management Plan” for the Blessington eGreenway has been prepared. This plan will undergo further development and refinement prior to the greenway's public opening and covers the following key topics:

1. Operational Management Structure
2. Greenway Management Duties
3. Financial Resources
4. Inspection and Maintenance Plan and Activities
5. Monitoring
6. Complaint Management and Resolution
7. Code of Conduct
8. Control of Dogs
9. Water Safety
10. Operational Hours
11. Severe Weather Response Plan
12. Emergency Response Plan
13. Trail Accreditation and Insurances

Please refer to the outlined Maintenance and Management Plan included in the submission. We believe this plan will provide a robust framework for the effective and safe operation of the Blessington eGreenway.

2.2.9.3 Control of dogs

Summary of Issue Raised

Uncontrolled dogs may cause disturbance.

Response to Issue Raised

The outline Maintenance and Management Plan prepared for the proposed development takes into consideration measures for controlling dogs on the greenway and includes the measures outlined below. These measures will be implemented during the operational phase of the Proposed Development.

Wicklow County Council, in conjunction with the code of conduct, would like to remind all dog owners of their responsibilities, which are outlined below:

- Keep your dog on a leash. Have consideration for others, such as guide dogs, the elderly, and children, and by keeping your dog on a lead on the Greenway.
- All dog owners must keep their dogs under effectual control.
- All dog owners must have a licence for each dog in their possession or a general dog licence to cover all dogs in their possession - you can purchase a dog licence from the Post Office or from your local authority.
- All dog owners must ensure that every dog under their control shall at all times wear a collar bearing the name and address of the owner and that the name and address are legible.
- All dog owners must collect and properly dispose of faeces deposited by their dog on the Greenway.

For Dog owners that have a restricted dog breed or strains and crosses of them, those dogs must be:

- Kept on a short strong lead by a person over 16 years who is capable of controlling them.
- Muzzled whenever they are in a public place.
- Wear a collar bearing the name and address of their owner at all times.

In accordance with The Control of Dogs Regulations 1998 (S.I. No. 442 of 1998)

2.2.9.4 Litter disposal

Summary of Issue Raised

The facility will support people visiting the area which will result in litter.

Response to Issue Raised

Bins will be provided at the car parks. A fundamental element of the management of the facility will be waste management and disposal.

2.2.9.5 Materials proposed for the Greenway Surface

Summary of Issue Raised

The proposed use of asphalt/tarmacadam surface is not appropriate for the setting.

Response to Issue Raised

The pavement proposed has been identified to provide good ride comfort and a safe cycle surface for users throughout the life of the Greenway. A cycleway with a high-quality pavement will provide a safe, attractive, and comfortable environment for potential users. Bituminous material base and surface course is recommended where high traffic volumes are expected and significant cumulative riding quality impact on user experience is expected. The pavement proposed is to be provided in accordance with TII publication Rural Cycleway Design (Offline & Greenway) DN-GEO-03047 August 2022.

2.2.9.6 Shared Use of the L8360 road

Summary of Issue Raised

The proposed shared use of the L8360 road for cyclists and vehicular traffic is not appropriate.

Response to Issue Raised

This road is a quiet residential road with relatively low volume of vehicular traffic. The proposal for cyclists to share this road with vehicular traffic is appropriate and in accordance with guidance provided in the Irish Cycle Manual.

2.2.9.7 Impact on car parking in Blessington Town

Summary of Issue Raised

The removal of car parking outside the Centra in Blessington Town is not acceptable.

Response to Issue Raised

A technical note has been prepared titled “**Technical Note on parking arrangements on Blessington Main Street for Blessington eGreenway**”. This note outlines existing conditions and the proposed arrangements associated with the proposed development. The note also addresses how the proposals align with the Design Manual for Urban Road and Streets with respect to the provision of segregation between vehicular traffic and active travel. The Design Manual for Urban Road and Streets outlines the importance of delivering connectivity by active travel and managing traffic speeds. The proposals provide a connectivity between the greenway to the north and south of Blessington town centre allows for safe travel for anybody using the greenway.

2.2.9.8 Drainage Systems

Summary of Issue Raised

Concerns about the numerous streams, particularly in Baltyboys, or other lakeside areas, that join the lake. What drainage system will be put in place to deal with these streams? We have concerns that if there is no proper outlet for these, that water will back up and cause flooding.

Response to Issue Raised

This issue will be addressed through a Section 50 application (of the Arterial Drainage Act) to the Office of Public Works.

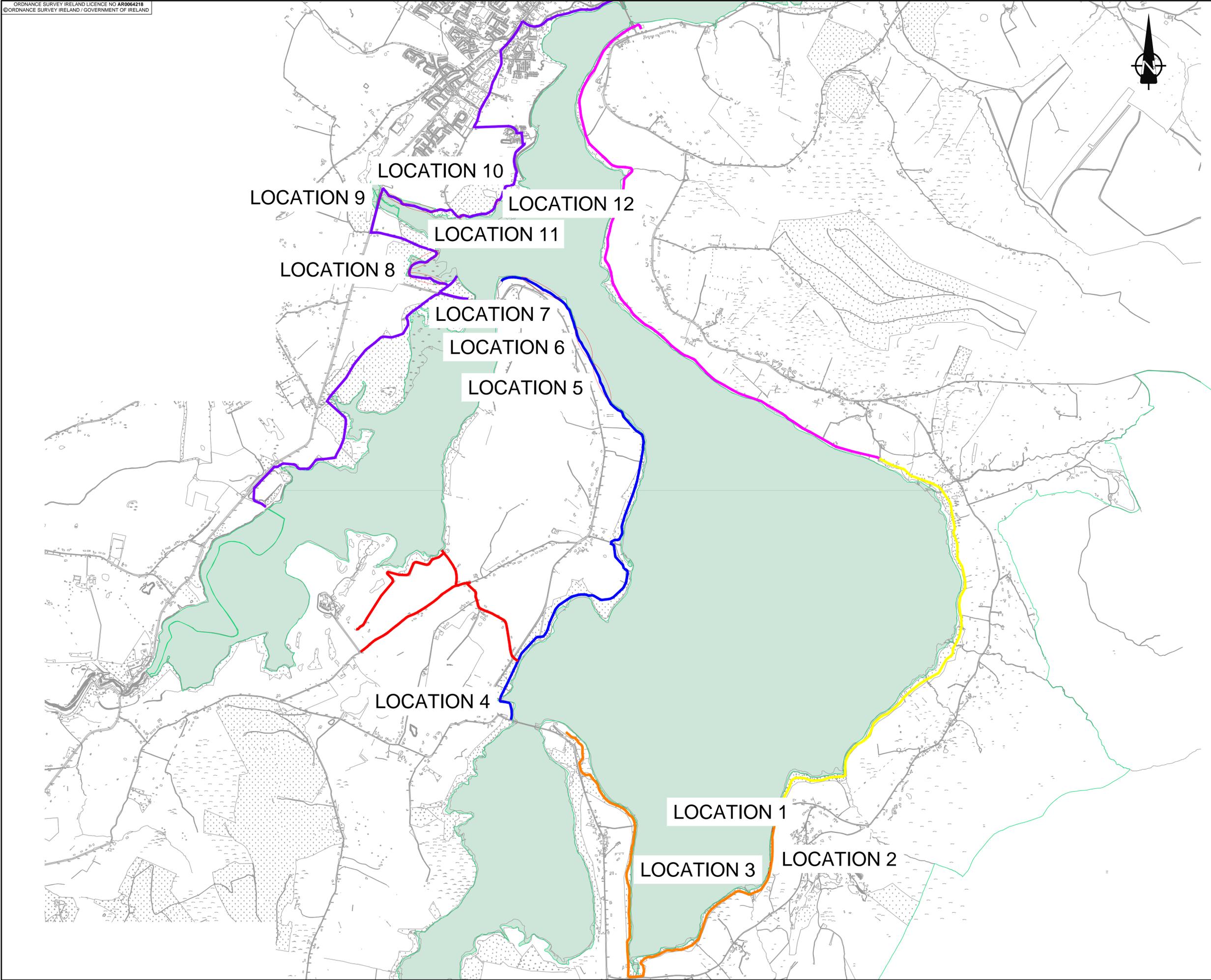
Appendix A

60617025_SHT_BLGWY_101_OVERALL_SPA INTERACTIONS

60617025_SHT_BLGWY_150_SPA INTERACTIONS

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KEY:

BLESSINGTON	
BALTYBOYS	
TULFARRIS	
VALLEYMOUNT	
BALLYKNOCKAN	
LACKEN	
POULAPHOUCA SPA	

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NO	DATE	DESCRIPTION
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I/R	DATE	DESCRIPTION

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PROJECT NUMBER
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SHEET TITLE
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 POULAPHOUCA SPA
 SHEET 1 OF 1

SHEET NUMBER
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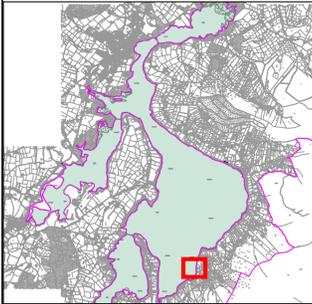
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LOCATION 1

LOCATION 2

LOCATION 3



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KEY

	POULAPHOUCA SPA
	PROPOSED GREENWAY
	PROPOSED GRASS VERGE
	PROPOSED EARTHWORKS FILL
	PROPOSED EARTHWORKS CUT
	PROPOSED WATER CROSSING STRUCTURE
	PROPOSED ROCK ARMOUR

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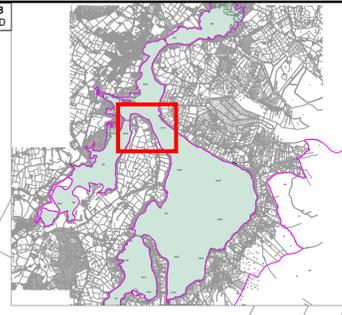
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KEY

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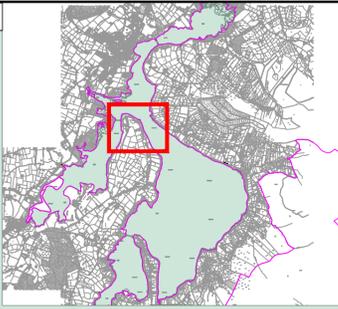
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 INTERACTIONS WITH SPA
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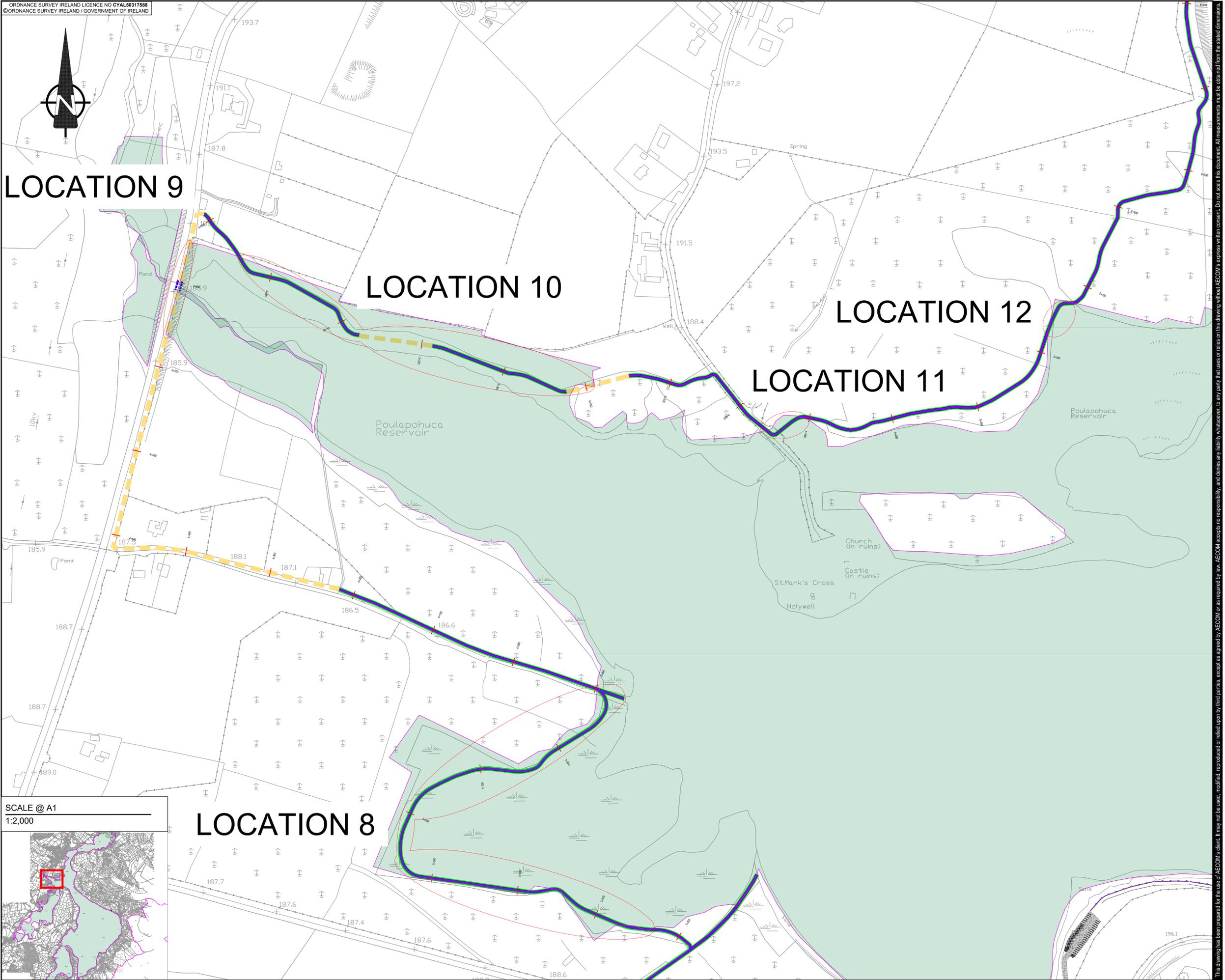
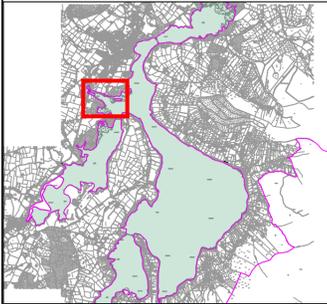
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LOCATION 11

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