



Draft Blessington Local Area Plan Submission - Report

Who are you:	Agent
Name:	Sraith Fhada Housing Ltd.
Reference:	DBLESSLAP-190036
Submission Made	December 11, 2024 7:12 PM

Topic

Overall Strategy of the LAP

Submission

See attached document.

Topic

Town Centre Regeneration / Retail / Opportunity Sites / TCF Plan

Submission

See attached document.

Topic

Tourism Development / Greenway Supporting Infrastructure Map

Submission

See attached document.

Topic

Local Transport Assessment / Transport Strategy Map

Submission

See attached document.

Topic

Active Travel Strategy Map

Submission

See attached document.

Topic

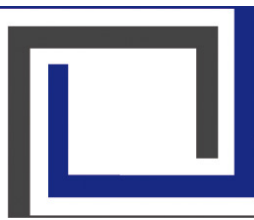
Proposed Variation No. 3 to the CDP

Submission

See attached document.

File

Downshire Hotel Lands draftBLAP Submission.pdf, 0.41MB



"BLESSINGTON LAP" & "VARIATION NO.3" SUBMISSION

Administrative Officer, Planning Department,
Wicklow County Council, County Buildings,
Station Road, Wicklow Town,
Co. Wicklow, A67 FWg6

Wednesday, 11th December 2024

[Via <https://blessington-wicklow.hub.arcgis.com/pages/submission>]

Dear Sir/Madam,

RE: SUBMISSION TO THE DRAFT BLESSINGTON LOCAL AREA PLAN AND VARIATION NO. 3 OF WICKLOW COUNTY DEVELOPMENT PLAN IN RESPECT OF THE (FORMER) DOWNSHIRE HOTEL, MAIN STREET, BLESSINGTON, CO. WICKLOW

1.0 INTRODUCTION & SUMMARY

The Planning Partnership, Chapel Street, Castlebar, Co. Mayo have been retained by Sraith Fhada Housing Limited to make this submission on the *Draft Blessington Local Area Plan* (dLAP) in relation to their property being the (former) Downshire Hotel (and attendant grounds), Main Street, Blessington, Co. Wicklow, illustrated under Figure 1 below.

Specifically, our client requests:

1. That the Local Area Plan (LAP) does not include any policies and/or objectives that would interfere with the accessibility of the property from Main Street, including preservation of vital existing on-street parking and also access/egress to and from the property for delivery and other vehicles – *Objective BLESS3* and *Section B.1* in particular should be amended accordingly, as set out below;
2. That any public realm / active travel or related projects includes on-street and drop off type parking at the frontage to the property. Permanent changes to the Main Street should be a last resort, with demand an behaviour management the priority in the first instance; and,
3. That the LAP clarify that the 'Improving the Visitor Accommodation Offer' Chapter of the Blessington Town Centre First Plan is not an objective of the Planning Authority, being incompatible with the owners intentions for the lands and the live planning permission in situ on the lands.

With the inclusion of the above amendments, we consider that the subject lands can form an important part of the delivery of the overall aims and objectives of the LAP.

The landowners intend to apply for planning consent for a new scheme in early 2025, as part of which it is hoped to include an element of hospitality use to the former Hotel building to the front of the site, which will provide an active street frontage and life to this landmark site in the town core.

Convenient parking is a primary driver of critical mass to town centres, and any diminution in the town core parking provision could easily discourage customers and investment from the town centre. In the absence of the amendments proposed herein, the regeneration of the subject (and adjoining) lands would likely be inadvertently undermined for the lifetime of the LAP.

2.0 THE SUBJECT LANDS

The subject lands comprise the former Hotel buildings and attendant grounds to the rear and extending East and North of the adjoining Church grounds.

The lands measure c. 0.72 hectares and are served / accessed via Main Street and Kilbride Road.

Figure 1: Subject Lands (Outlined in Red – Boundaries Approx.)



Source: GeoHive Maps, annotated by The Planning Partnership

2.0 RATIONALE & CONTEXT

2.1 Draft Blessington Local Area Plan 2024-2030

The Draft Local Area Plan (dLAP) includes relevant objectives, including but not limited to the following:

Town Centre & Retail Objectives

- To support the continued enhancement of Blessington Town Centre as the heart of the settlement, where people of all backgrounds, ages and abilities can avail of services and interact within their communities;
- Ensure that the town centre is an attractive places to live in, to work in and to visit, easy to get to, easy to walk and cycle within and is a competitive place to conduct business;
- Create a compact town by reusing existing buildings and maximising the potential of infill and brownfield sites; use all mechanisms and processes available to drive forward the redevelopment and regeneration of vacant, underutilised and derelict sites;
- The redevelopment of lands within the town core area, particularly those sites with frontage onto the main streets and squares of Blessington, shall provide for street fronting buildings of a high quality design or for a high quality urban space, including hard and soft landscaping, and appropriate street fixtures and furniture, in order to enhance and create a more attractive streetscape;
- To allow a relaxation in certain development standards in the town centre zone in the interest of achieving the best development possible, both visually and functionally while maintaining the highest quality of design in all new developments;
- Facilitating a diverse mix of uses, and particularly encourage residential usage at appropriate town centre densities, and the concept of 'living over the shop';

Town Centre Objectives

BLESS1 To support and facilitate activities and developments that will improve the vitality, connectivity and vibrancy of Blessington Town Centre.

BLESS3 To support and facilitate improvements to the public realm in Blessington Town Centre to provide an attractive, comfortable environment for pedestrians, cyclists and users of public transport. Such improvements could include the following:

- Reductions in through traffic along Blessington Main Street
- ~~-The rationalisation and reconfiguration of car parking within Blessington Town Centre.~~
- The reconfiguration of traffic movements around Newtown Square.
- Improvements to the spatial and visual connectivity between Blessington Main Street, Market Square and Newtown Square
- ~~-The implementation of a comprehensive public realm scheme on Market Square and adjacent areas of Blessington Town Centre.~~
- The undergrounding of cabling along Blessington Main Street.

In summary, the balance of emphasis of the policies and objectives of the Draft LAP is weighted towards regeneration and reuse of vacant and under utilised lands and buildings in the town core.

These policies and objectives should outweigh any competing or interfering policies and objectives relating to parking and public realm

Notwithstanding that some improvements to the public will be required, these should be proportionate to need, and with due regard to the potential for unintended consequences in terms of undermining accessibility and footfall in the town centre.

Specifically, we request that the above text in ~~red~~ be omitted from *BLESS3*, and any related provisions of the Draft LAP, including Section B.1 and Figure B.1.1.

2.2 Blessington Local Transport Assessment

The Blessington Local Transport Assessment includes relevant content, including but not limited to the following:

Segment N2 – N81 along Blessington Main Street:

This segment has a good alignment and has a generous width along most of its length, although some pinch points exist, for example towards the junction with the Naas Road. This road segment constitutes Blessington Main Street, the primary town centre street in the settlement. Footpaths of varying widths are present along the street, although no cycling infrastructure is present. A large amount of road space is currently allocated to perpendicular car parking. Cars entering and leaving these perpendicular spaces can conflict with traffic travelling along Blessington Main Street, and there have been collisions recorded along this section of road arising from such movements. Rationalisation of the number of parking spaces along this segment, and/or their reconfiguration to diagonal or parallel parking bays, would likely improve road safety and allow for road space allocation to pedestrians and cyclists. There are also 3 No. entrances/exits in close proximity from Market Square car parking. Similarly, at the southern end of this road segment, an entrance from Rockypool Villas at the Naas Road junction is poorly defined and is not vital for access to those houses. A public realm scheme could consider reducing the number of exits from Market Square to improve traffic safety, and the rationalisation of other junctions as necessary. Currently, Blessington Main Street is also the main arterial route to Dublin from Blessington and all other settlements south along the N81. This results in high traffic volumes along the street. The completion of the Blessington Inner Relief Road and/or N81 bypass would likely reduce through-traffic along its length, and result in improved movement/priority for public transport.

Recommendations for Segment N2:

- *Reduce and/or reconfigure car parking spaces along Blessington Main Street.*
- *Provide cycling infrastructure and pedestrian infrastructure improvements.*
- *Improve public realm (including a rationalisation of junctions where necessary).*
- *Reduce through-traffic along Blessington Main Street.*

Blessington Main Street - c. 188 spaces:

Perpendicular car parking is present on both sides of the street. Traffic movements in and out of these spaces can cause conflicts with traffic traversing the carriageway. Parking surveys (which included Market Square) have indicated that the majority of car parking spaces (56%) along the street were used for longer term parking of three hours or more, with a higher rate of 66% of spaces used for that purpose at the southern end of the street. In total, 122 No. vehicles were parked for longer than three hours at the time of the survey. Many vehicles (c. 42) parked for longer periods arrived between 7am-10am and left between 4pm-7pm, indicative of commuters parking on the street to access public transport. Notably, even when accounting for illegally parked cars, the parking survey indicated that there were always enough spaces available, with a peak saturation of 82% of spaces occupied around midday.

Market Square - c.30 spaces:

Market Square is currently used as surface car parking. An area in front of the Credit Union has been paved in recent years, which divides the car parking area into a northern and southern section. There are three entrances/exits onto Blessington Main Street in close proximity to one another that are poorly defined and have poor visibility along Blessington Main Street. The above parking survey for Blessington Main Street included Market Square and indicated that long-term parking was occurring in the area.

2.4.1 Car Parking Improvements

In light of the above discussion in relation to active travel and the usage of the road network by private vehicular traffic, it will be the aim to reclaim Market Square as a pedestrian-focused/priority area with a high quality public realm, with a reduction in through traffic along Blessington Main Street. The Blessington Main Street N81 Road Safety Improvement Scheme will likely involve the reconfiguration or rationalisation of car parking in the area, while a public realm scheme as proposed under the Blessington Town Centre First Plan would include the removal of car parking spaces.

eGreenway parking: The proposed Blessington eGreenway could have significant implications on car parking within Blessington."

2.4 Blessington Town Centre First Plan

The Blessington Town Centre First Plan includes relevant content, including but not limited to the following:

"Parking

Parking orientation in the town centre of Blessington is primarily perpendicular to the road carriageway, which maximises on street parking. Perpendicular parking is generally better suited in low-speed environments as set out in DMURs. For Blessington, as the town is situated along the N81, the implementation of traffic calming devices should be explored to reduce vehicular speeds.

A report from 2019 identified that there have been a number of collisions as a result of the perpendicular parking. Recommendations to reconfigure the layout to angled parking are suggested.

Perpendicular parking should be restricted to one side of the street to provide a sense of enclosure and ensure that parking does not dominate the streetscape. By restricting perpendicular parking to one side of the street, options open up for any additional space to be occupied by cycle lanes, outdoor areas for businesses such as seating and better street furniture.

Given Blessington's geographical location, it is highly likely that long term storage of vehicles is occurring for the purposes of carpooling and availing of public transport.

Recognising this issue, the 2013 LAP sets out a potential location for an area zoned park and ride for commuters from the south. A parking survey carried out in 2019 (Barry Transport Feasibility Report) highlighted that parking across Blessington was recorded for longer than a 3 hour stay.

Furthermore, it notes that there was a peak saturation of 82% for parking and Blessington has not experienced more demand for parking than parking spaces available. It is understood that that there is no parking enforcement on the main street of Blessington. Parking enforcement should be considered as a method to regulate parking. This would be beneficial to businesses and the town centre, as parking spaces would likely become more available as well as discouraging long term parking and promoting active travel.

Car parking in the town centre is predominantly on-street car parking and there would appear to be a relatively high turnover of occupancy of car parking spaces.

The main car parking provision in the town centre is in the form of onstreet car parking, but there is also surface car parking available at Market Square, the new town centre and close to Main Street beside the former Health Centre (less than 1 minute walk from Main Street).

Supervalu provides surface car parking to the rear of shop (accessed from the Kilbride Road). There is also a multi-storey car park at the new town centre development. The other most substantial car parking area is at Aldi in the northern end of Main Street. While on-street car parking on Main Street could be seen as a traffic hazard, it is also a form of traffic calming and its removal could be counter productive by increasing traffic speeds."

3.0 RATIONALE FOR PROPOSED AMENDMENTS

The following elaborates on the specific site context and proposed objectives relating to same.

3.1 Outdated Baseline Relied Upon

It is apparent from a review of the Draft LAP, Blessington Local Transport Assessment and Blessington Town Centre First Plan that the assumptions and recommendations therein are reliant on a 2019 parking survey.

We respectfully submit that it is not appropriate to form medium term policy (to 2030) on the basis of such a currency of data. Much has changed in the intervening period, not least the occurrence of the Covid 19 Pandemic which has wrought far reaching on all manner of patterns of activity.

What may or may not have been a pattern in 2019 can no longer be relied upon in terms of setting a baseline for 2024, or an ambition for 2030.

In the absence of up to date analysis, no significant conclusions or decisions should be made in respect of car parking and public realm interventions.

3.2 Forms & Location of Parking

For the avoidance of doubt, we note that much of the commentary around the shortcomings of car parking on Main Street relate to its configuration as perpendicular to the street.

Parallel parking is also a prevalent feature, in particular along the frontage of the subject lands.

Any rationale for adjustment to perpendicular parking thus has no basis in justification of changes to parallel parking.

In addition, the comments of the Town Centre First Plan are noted in terms of the potential unintended consequences of changes, where *"on-street car parking on Main Street could be seen as ... a form of traffic calming and its removal could be counter productive by increasing traffic speeds."*

Furthermore, the location and pockets of parking along Main Street should be recognised, in that 'Main Street' is not a homogenous zone, rather exists along an extended corridor.

As such, preservation of parking to the outer edges of Main Street, and loss of spaces in the core, such as at the subject lands, would be disproportionately impactful on the subject lands and surrounds, as this area has generally less parking than other parts of Main Street.

However, the subject lands and surrounds should be the priority of the Planning Authority in terms of encouraging regeneration of buildings and land use.

In particular, given the hospitality use anticipated for the subject lands former core building, ease of access for passing trade is of crucial importance, as is access for services and deliveries.

3.3 No Allowance for Demand from Regeneration

In addition to the above, there are numerous policies and objectives promoting the intensification of the town centre, and the core retail area in particular in the Draft LAP, hence any assumptions around the parking and associated needs of that area at present, are not indicative of the future needs.

The redevelopment / refurbishment of the subject lands would for instance mark a significant change in the nature of activity in and around the Main Street, which should not be prejudiced by the premature reduction in parking capacity.

Any material change to parking capacity in and around the Main Street could easily stymie commercial investment into the long term in this regard.

3.4 Demand Management should be Priority with Permanent Changes should be Last Resort

As noted above, some improvements to the public will be required, these should be proportionate to need, and with due regard to the potential for unintended consequences in terms of undermining accessibility and footfall in the town centre.

The Draft LAP, Blessington Local Transport Assessment and Blessington Town Centre First Plan refer for instance to factors such as:

- Closure of upper levels of multi-storey parking nearby;
- Absence of parking enforcement; and,
- Prevalence of long stay parking.

All of the above (and/or other practical issues) should be exhausted prior to undertaking any permanent or irreversible works to the public realm and parking capacity of the town centre.

It may well be the case that the potential disadvantages of on street parking can be actively managed, without creating further disadvantages in terms of loss of capacity.

3.5 Need to Build (rather than Reduce) Capacity for Greenway Demands

The Blessington Local Transport Assessment notes that *"the proposed Blessington eGreenway could have significant implications on car parking within Blessington"* and *"In order to future proof this project, it is considered prudent that an additional area of car parking be included in proximity to the proposed Blessington eGreenway within the plan area, to account for any unforeseen usage level on the greenway."*

Whilst recently refused permission, the Greenway is anticipated to be developed in some form in the medium term, and provision should be made for its eventual development, which we understand relates to annual visitor numbers of c. 300,000, comprising 765 No. cars (weekend) daily, each of which will require car parking.

Parking in Blessington and its environs could therefore be easily overwhelmed by the project.

No diminution of car parking in Blessington should therefore be considered in the absence of clear and overwhelming need, evidence and universal stakeholder support.

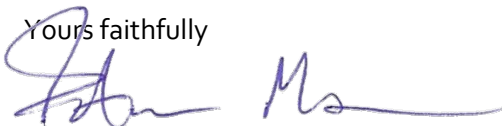
4.0 CONCLUSION & SUMMARY OUTCOME SOUGHT

In summary, our client seeks that:

1. That the Local Area Plan (LAP) does not include any policies and/or objectives that would interfere with the accessibility of the property from Main Street, including preservation of vital existing on-street parking and also access/egress to and from the property for delivery and other vehicles – *Objective BLESS3* and *Section B.1* in particular should be amended accordingly, as set out below;
2. That any public realm / active travel or related projects includes on-street and drop off type parking at the frontage to the property. Permanent changes to the Main Street should be a last resort, with demand and behaviour management the priority in the first instance; and,
3. That the LAP clarify that the 'Improving the Visitor Accommodation Offer' Chapter of the Blessington Town Centre First Plan is not an objective of the Planning Authority, being incompatible with the owners intentions for the lands and the live planning permission in situ on the lands.

I trust the above is of interest and should you have any queries or wish to discuss further please do not hesitate to contact me.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Fintan Morrin', is written over the typed name.

Fintan Morrin

Principal

The Planning Partnership