



Draft Blessington Local Area Plan Submission - Report

Who are you:	Agent
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11 December 2024

Blessington LAP,
Administrative Officer,
Planning Department,
Wicklow County Council,
County buildings,
Station Road,
Wicklow Town,
Co. Wicklow
A67 FW96

SLR Project No.: 501.065451.00001

**RE: Blessington Local Area Plan - Submission to the Draft LAP 2025
Submission on behalf of Belgard Estates Ltd.**

SLR Consulting Ireland acts as planning and environmental advisors to Belgard Estates Ltd. of [REDACTED].

This written submission relates to the Draft Blessington Local Area Plan (hereafter referred to as "Draft LAP") Consultation, which concludes on the 11th of December 2024. It follows our attendance at the WCC Draft Blessington LAP consultation event at 16.00 on 21st November 2024 held in the Civic Office, Blessington.

1.0 Introduction

Blessington is the largest town on the western side of Wicklow County and is a Level 3, Self-Sustaining Growth Town, with good transport links and capacity for growth. According to Census 2022, the population of Blessington has increased to 5,611 persons, a 10% increase on the 2011 census.

Belgard Estates Ltd. hold a significant and strategic landbank within the LAP area. This submission relates to the following areas of this landbank (also shown in **Figure 1**):

1. **Lands at Doran's Pit – Processing Area East of Existing N81** : Located within the eastern portion of the LAP area, in the townland of Haylands, accessed by the N81 national secondary road, which connects Blessington to Dublin City Centre to the north (c.27km) and Kilbride Road linking Blessington with the wider hinterland. These lands are included under 'Action Area 4 – Lands at Doran's Pit' and SLO4 in the Draft LAP.
2. **Quarry Lands – East of the Proposed N81** In the north-western portion of the LAP area, lands in the townlands of Santryhill, Newpaddocks, Dillonstown and Deerpark, are accessed by the N81 national secondary road. These lands are currently zoned for 'employment' use and extractive industry.
3. **Quarry Lands – West of the Proposed N81** In the north-western portion of the LAP area. These lands are currently zoned as extractive industry.

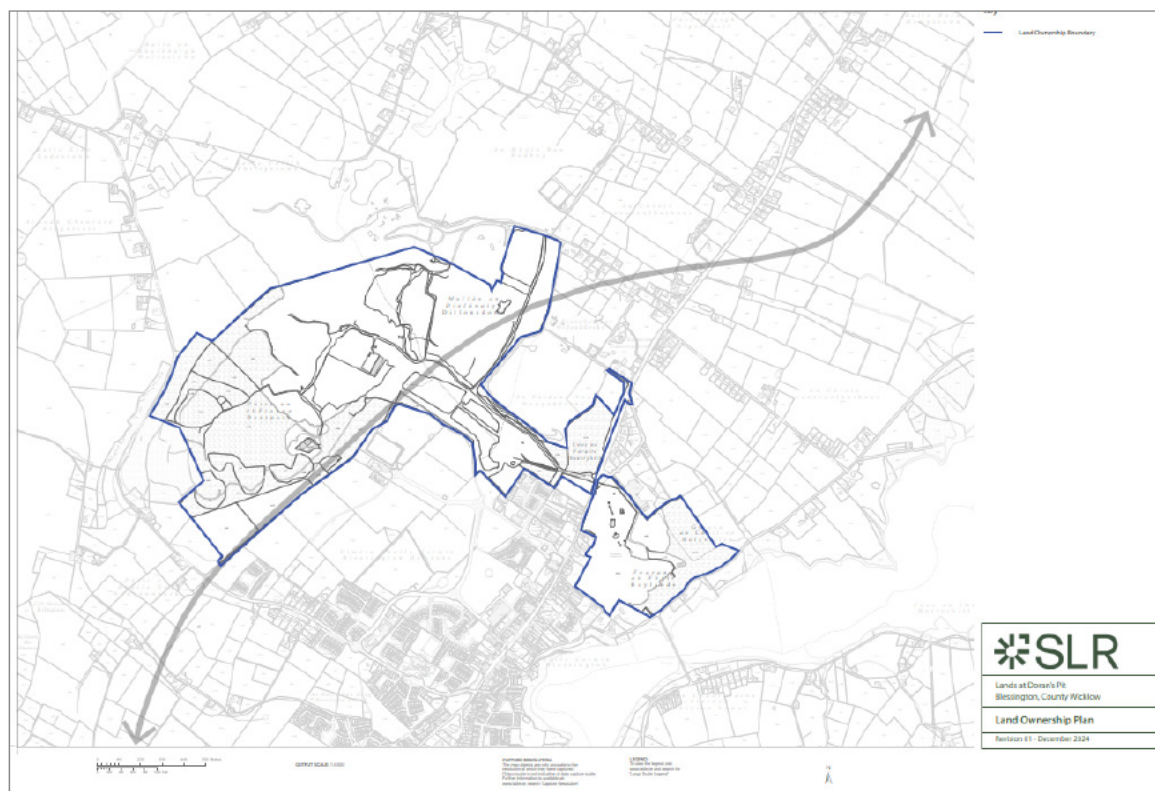


Figure 1: Landownership outlined in Blue



2.0 Basis of this Submission

2.1 Draft Blessington Local Area Plan 2025

Healthy placemaking, climate change and economic opportunity are the three themes of the Wicklow County Development Plan 2022 - 2028 (WCDP), which, as stated in the Draft Blessington Local Area Plan 2025 (Draft LAP), are the *‘strategic objectives that inform and shape this Local Area Plan.’*

The Draft LAP also outlines the relationship with the WCDP in that:

‘the development strategy must be consistent with the ‘Core Strategy’ of the County Development Plan and reflect the history, physical characteristics, strengths and weaknesses of the area.’

It is further noted, by way of Variation 3 to the WCDP, that the WCDP provides the key parameters for Local Area Plans such as the future population and housing targets and sets out the broad strategy for the future economic and social development of these towns.

To ensure that the zoning and key development objectives of LAPs clearly form part of the WCDP, the land use zoning and key development objectives maps in the LAPS will be adopted by way of variation into the CDP.

Residential Development

Table A in the Core Strategy tables of the WCDP (extract shown in **Figure 2** below) identifies the housing unit requirement for each of the LAP towns, up to the year 2031, and the housing unit capacity of lands zoned in these LAPs, which were in effect at the time of the adoption of the WCDP in 2022.

CORE STRATEGY TABLES

Table A: LAP Towns

This analysis utilises the 2031 housing targets, having regard the likely timeframes of future LAPs (6-10 years), due to be adopted in the 2023 – 2025 period.

SETTLEMENT		POPULATION & HOUSING				ZONING							
Settlement Type	Settlement name	A Census 2016 Population	B Census 2016 (%)	C Housing Target 2016-2031 (less completed units 2017-2020) (units)	D Housing Target (as % of County 2031 target)	E Development capacity of existing zoned lands (units) ⁷	F Development capacity of existing zoned land within built up area (units)	G Development capacity of existing zoned land outside built up area (units)	H Development capacity of existing zoned land within built up area as % of total development capacity (F/E)	I Units required to be provided outside of built up area (units) (C – F)	J Surplus capacity of existing zoned land outside built up area (units) (G – I)	K Surplus land outside of existing built up area (ha)	L Method of addressing shortfall / surplus
County	Wicklow	142,425		11,719	100%								
Key Towns	Bray	29,646	21%	4,897	42%	6,500	2,000	4,500	31%	2,897	1,600	40 ⁸	Will be addressed in next LAP – comprises strategic sites
	Wicklow - Rathnew	14,114	10%	1,742	15%	4,200	2,000	2,200	48%	0	2,200	55 ⁹	21ha already under construction; remaining surplus will be addressed in next LAP
Self Sustaining (Growth) Towns	Arklow	13,226	9%	1,056	9%	5,200	2,100	3,100	40%	0	3,100	78	11ha already under construction; remaining surplus will be addressed in next LAP
	Greystones-Dealgany	18,021	13%	1,078	9%	2,900	1,700	1,200	59%	0	1,200	30 ⁸	7.5ha already under construction; remaining surplus will be addressed in next LAP
	Blessington	5,234	4%	514	4%	1,450	300	1,150	21%	215	935	31 ⁹	Surplus will be addressed in next LAP
	Enniskerry	1,877	1%	91	1%	520	375	145	72%	0	145	5 ⁹	Surplus will be addressed in next LAP
	Kilcoole	4,244	3%	190	2%	600	460	140	77%	0	140	5 ⁹	Surplus will be addressed in next LAP

Figure 2 Extract from the WCDP Core Strategy tables (Table A)

Level 3, Self-Sustaining Growth Towns are defined in the CDP as:

Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.



Level 3, Self-Sustaining Growth Towns are targeted for **growth rates of 25%-30%**, with a population target of 6,145 (population of Blessington is currently 5,611 persons according to Census 2022) and total housing growth 2016-2031 of 519 units.

Table A of the Core Strategy Tables on page 60 of the WCDP (extract shown in **Figure 2** above) contains analysis of the position in relation to the meeting the 2031 housing targets. Although it concludes that there is a surplus of zoned land of 31ha (based on a density assumption of 30 dwellings per hectare) in the Blessington LAP area and that this surplus will be addressed in the next LAP¹, this position will need to be revised as a result of new housing targets published in November 2024.

The locational requirements for residential development prioritise 'Edge of centre' locations for new greenfield residential and these locations are generally zoned as 'New Residential - Priority 1' (zoned RN1).

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.

Objective BLESS7 states that

Permission will not be considered during the lifetime of this plan for RN2 lands unless the following conditions are satisfied:

- *Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.*

Economic Development & Employment

An established measure of the employment 'health' of a settlement is a measure called the 'jobs ratio'. This is the relationship between the resident workers and the number of jobs in any defined area.

It is the aim of the WCDP to increase the County's job ratio to 70% by 2031, which will require some locations to exceed this level, and even to exceed 100%, in order to counter balance areas, such as smaller settlements and rural areas, that would be unlikely to reach such a high level of employment.

While the jobs ratio in Blessington has improved between 2016 and 2022 reflecting the important role the town plays in the economic development and support of its hinterlands, the ratio in Blessington falls short of what would be desired given its position in the County Economic Development Hierarchy and its strategic economic importance in West Wicklow.

The Draft LAP calculates that a minimum quantum of zoned employment land is 19 hectares which will achieve a targeted future jobs ration of 90%.

Blessington's designation as a Level 3 self-sustaining growth means it is a **strategically important location for economic growth and employment development**. Economic Development & Employment Objectives within the Draft LAP will therefore seek to promote the growth of economic activity and employment in the town centre and built up parts of the

¹ As of November 2024, agreed revisions to the housing targets for the period 2025 to 2030 will aim to deliver a total of 303,000 new homes across Ireland and will result in a revision to WCDP targets with an increased housing requirement at the local level.



town. Where a demand for ‘greenfield’ employment development is identified the Draft LAP will ensure zoned, serviced land is available in appropriate locations in accordance with the zoning principles of the WCDP. The Draft LAP will also support a shift towards low carbon and climate change resilient economic and enterprise activity, reducing energy dependence, promoting the sustainable use of resources.

Relevant Employment Objectives include:

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.

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.

Quarries

The Draft LAP notes the growth of a significant sand and gravel extraction industry over the course of the 20th century, focused on the Blessington Delta geological feature in an arc across the northern boundary of the town. The Draft LAP also states that:

Until such time as this area can be appropriately redeveloped, it will present a significant barrier to the northward extension of the settlement.

In parts of this area, quarrying has ceased and the land has been remediated. This remediation has retained steep slopes and quarry faces in some circumstances, which may present difficulties in redeveloping the lands.

To the east of the N81, the Draft LAP also refers to a single area of quarrying known as Doran’s Pit extends as far as Kilbride Road to the east. Unlike the western quarry area, the Draft LAP recognises that Doran’s Pit has a flatter ground level, with the area having been used primarily for ancillary quarry activities rather than active quarrying in recent years. As a result of this, this site is recognised as being more readily available for intensive redevelopment in the shorter term.

Heritage, Biodiversity and Green Infrastructure

‘Local Biodiversity Areas’, of which the vast portion of the newly zoned OS2 lands has been designated under, were identified on foot of a 2006 report prepared by Natura Environmental Consultants. As stated in the Draft LAP, this designation is non-statutory and has guided the creation of ‘ecological corridors’ within the plan area. The newly zoned OS2 lands were described as being of ‘high local value for biodiversity’ in this 2006 report.

The green corridors as identified in Map No. 3 of the Draft LAP (Key Green Infrastructure) are ‘primarily watercourse-based’, which form the core of ecological corridors in the area. The remaining green corridors identified were either ‘of potential biodiversity value’ or ‘in order to connect the individual sites into a coherent, interlinked network of ecological corridors and ‘necklace’ effect routes.’

Relevant heritage, biodiversity and green infrastructure objectives:

BLESS39 – To require development proposals to have regard to existing green infrastructure assets (as identified within this local area plan or otherwise), including trees and hedgerows, that may exist within a subject site, and to consider how the biodiversity value and ecological connectivity of such assets may be maintained.

Where existing GI assets or green corridors within a site have been identified on Map No. 3 ‘Key Green Infrastructure’ or the accompanying Blessington Green Infrastructure



Audit, proposals should include measures to preserve and, where necessary, improve ecological connectivity and biodiversity value across said assets/corridors.

BLESS40 – *To facilitate the development of new green corridors within the plan area where opportunities may be identified, and barriers in ecological connectivity rectified, via the development management process. In particular, the following additional green corridors will be facilitated:*

- *The creation of green corridors through Quarry Lands, and where relevant SLO3, to link the Deerpark watercourse and Glen Ding Forest with the plan boundary in the direction of the Red Bog SAC.*
- *The creation of green corridors linking the Deerpark Watercourse to Local Biodiversity Areas and existing wooded areas on the eastern boundary of SLO3 [...]*

2.2 Key Changes in the Draft LAP

Lands at Doran's Pit Processing Area East of Existing N81

Under the 2012 Blessington Local Area Plan, the lands at Doran's Pit (townlands of Haylands and Holyvalley) are included under 'Action Area 4 – Lands at Doran's Pit', which states that the subject lands shall provide for mixed residential development, a local neighbourhood centre and active open space areas. A portion of these lands are also located outside the eastern boundary of the Action Area 4 and were zoned employment.

The Draft LAP proposes to make key changes to the zoning of this area of lands. 18 ha is now zoned for mixed use development, replacing the previous residential zoning comprising 17 ha. Whilst the previous employment zoning of 4.5ha is to be replaced by an extended 'natural area' zoning, which has increased from 10.8 ha to 15.3 ha. SLO4 is also included in the Draft LAP which makes reference to specific requirements in relation to these lands.

Quarry Lands –East of the Proposed N81

Under the 2012 LAP, the lands at Santryhill, Newpaddocks, Dillonstown and Deerpark are zoned for 'employment' use. Of importance the NRDO indicative N81 Route and corridor traverses these lands. There are also a number of indicative road lines and indicative pedestrian and cycle routes shown traversing the subject lands within the LAP zoning map.

The Draft LAP proposes to reduce the previously 23.4 ha of employment zoned lands to 15.2 hectares, allocating the balance of 6.8 ha as 'natural area' zoning.

There is a continuation of extractive industry zoning at land adjacent to the NRDO indicative N81 Route and corridor.

SLO3 is also included in the Draft LAP which makes reference to specific requirements in relation to these lands.

Quarry Lands – West of the Proposed N81

Under the 2012 LAP, the lands to the west of the N81 are zoned as 'extractive industry'. There is a continuation of this zoning in the Draft LAP.





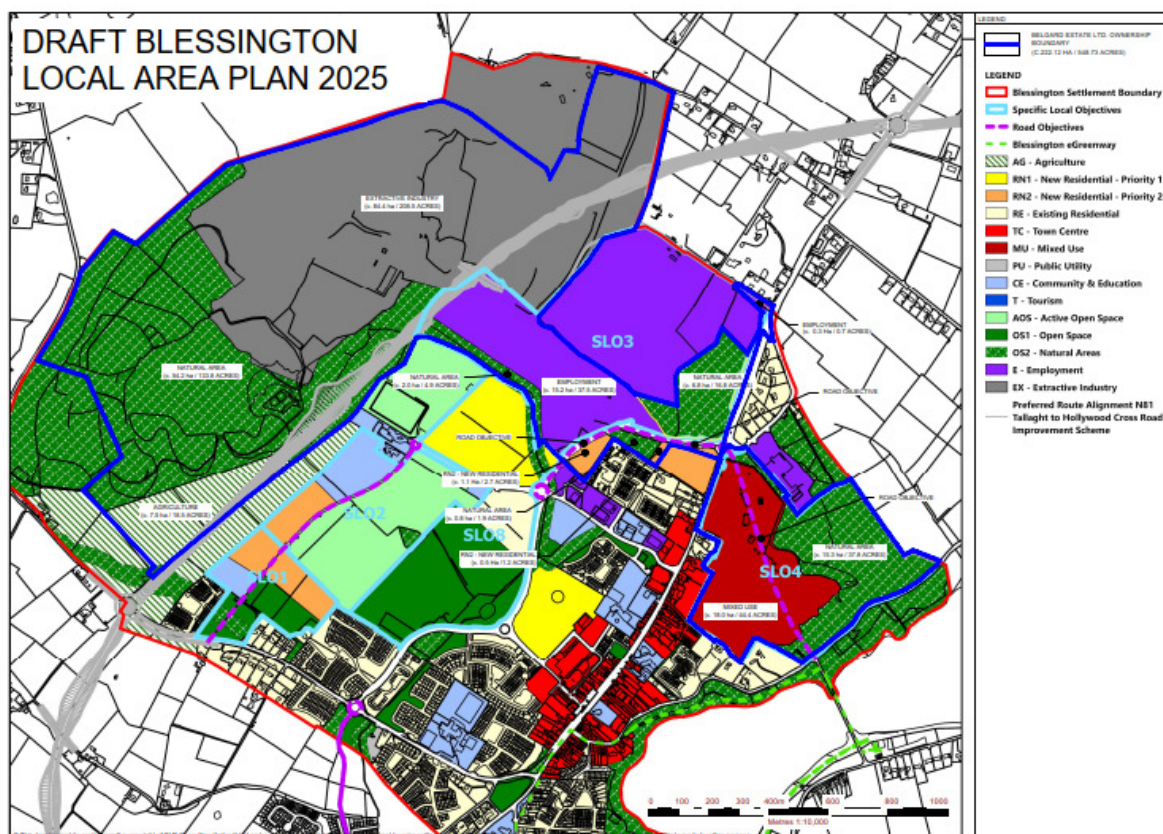


Figure 4: Draft LAP Zoning Map (landownership in blue)

3.0 Submission on Draft LAP

3.1 Lands at Doran's Pit Processing Area East of Existing N81

The zoning of lands at Doran's Pit has been revised to reflect relevant heritage, biodiversity and green infrastructure objectives as well as tourism potential due to its proximity to the *Poulaphouca Reservoir*.

Our client is supportive of this approach including the extended natural area, the proposed mixed use zoning at this location and the classification of this area as an urban neighbourhood / extension in recognition of its location immediately adjacent to the existing town centre.

Our client also welcomes the objective of maximising the efficient use of centrally located land with urban neighbourhood type development which is deemed appropriate at this location. It is also recognised that relatively higher density development is needed to support the delivery of infrastructure.

Our client acknowledges that residential development within this SLO4 area shall be considered 'RN2 – New Residential Priority 2' and as set out in the Draft LAP, permissions will not be considered for land zoned as 'RN2 – New Residential Priority 2' until 75% of Priority 1 lands have been activated (consent obtained and development initiated) and it can be shown that the housing / population generated by the proposed development would not result in Core Strategy targets being significantly breached.

Under the Draft LAP, the subject lands at Doran's Pit make up a portion of a 'Specific Local Objective' designation, which is intended to guide developers on land use, infrastructure and phasing requirements. A range of community, sporting, tourism facilities and infrastructure are to be provided under SLO4. This infrastructure includes:



- A road linking the N81 to Kilbride Road/Knockieran Bridge
- A pedestrian/cyclist only street
- A multi-purpose community building fronting onto the central park/plaza.
- A childcare facility of a sufficient size fronting onto the central park/plaza.
- c.3.3 ha of active open space / sport uses
- not less than c.2.7 ha for the possible future development of an amenity car park and other tourism infrastructure.

Requested Amendment: Removal of Concept Plan

We wish to raise a number of significant concerns relating to Specific Local Objective 4.

Firstly, the Concept Plan provided on page 72 of the Draft LAP shows the zoned area to the east of the new road as green space / undeveloped land in its totality which is wholly inconsistent with the zoning map.

Ultimately, the delivery of infrastructure at this location will depend on market conditions and development viability. There is a significant concern that inconsistencies between the zoning map and this concept plan will lead to developer uncertainty and inconsistent expectations as to the preferred land use on this side of the road.

In its current form, the Concept Plan and supporting text indicates a vast area and unsuitable location of active open space and car parking/tourism use with no indication of a viable end user for both facilities. This approach is inconsistent with Environmental Protection policy (CPO 11.52) set out in *Chapter 11 Tourism and Recreation* of the WCDP which states that

Where projects for new tourism projects identified in this chapter are not already provided for by existing plans / programmes or are not already permitted, then the feasibility of progressing these projects shall be examined, taking into account planning need, environmental sensitivities as identified in the SEA Environmental Report and the objectives of the plan relating to sustainable development.

The appropriate size and location of these facilities must ultimately be decided by the proposed end user or developer of these lands. The appropriate and sustainable mix of uses will therefore be led by development viability and the need for good place making that achieves the principles of good urban design.

The reservation of land of not less than c.2.7 ha for the future development of an amenity car park and other tourism infrastructure is also a completely unsustainable model for tourism given the likely traffic generated by such a development. This level of car parking is also inconsistent with the need to facilitate modal shift to more sustainable transport options as identified in *Chapter 12 Sustainable Transportation* of the WCDP and to support the Avoid-Shift-Improve framework for transport sustainability as set out in Climate Action Plan 2024.

It is also inconsistent with policy objectives in the WCDP relating to tourism, including:

- CPO 11.33 To encourage eco-tourism projects² or those tourism projects with a strong environmentally sustainable design and operational ethos.
- CPO 11.51 Ensure the potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include

² Ecotourism is now defined as "responsible travel to natural areas that conserves the environment, sustains the well-being of the local people, and involves interpretation and education" (International Ecotourism Society TIES, 2015). Education is meant to be inclusive of both staff and guests.



potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.

There are also other significant issues with the proposed location as shown in the Concept Plan. This location is completely unsuited to creating safe and secure neighbourhoods that benefit from overlooking from surrounding uses.

The required facilities should be integrated within the fabric of the urban extension in contrast to its current location which shows segregated facilities with vast areas of car parking likely to generate significant and unsustainable levels of traffic and lead to poor design outcomes as well as adverse effects on the local biodiversity area.

The location of active open space facilities and proposed tourism facilities in the Concept Plan is also completely at odds with the requirements of Section 4.2.1 of the Design Manual for Urban Roads which requires the development of structures along a road or pedestrian/cyclist street in order to provide a strong sense of enclosure as per Section 4.2.1 of the Design Manual for Urban Roads and Streets.

As WCC has not included adequate rationale for the Concept plan and its proposed layout, it is requested that the Concept plan be omitted from the adopted LAP.

Requested Amendment: Reduced Quantum of Active Open Space / Tourism Requirement

There is also insufficient justification provided in the Draft LAP in relation to the quantum of active open space required at this location. The Draft LAP states that the provision of 3.3 ha of active open space and the reservation of land of not less than c.2.7 ha for the possible future development of an amenity car park and other tourism infrastructure is required. In total 6 ha of land is allocated for these uses, however no rationale for this amount of space at this location is provided.

It is noted that the pre-draft consultation indicated a considerable shortfall in the provision of active open space within the settlement, with sports clubs making submissions requesting that land be zoned for such purposes. The lack of a football field for Blessington AFC is also acknowledged. Nonetheless, there is no rationale given for requiring 3.3ha at this location.

While it is acknowledged that an area of active open space will be provided as part of SLO4, our client seeks a reduction in the quantum of active open space to 2ha given that this is considered more than sufficient to provide for the average football pitch, which measures approximately 0.714 hectares, and MUGA area.

The provision of a smaller area of active open space at SLO4 will also facilitate the development that is in keeping with the development of a compact urban extension. This is indicatively shown in **Figure 5** below as the detailed design of this active open space will be developed in accordance with a 'Social Infrastructure Audit' and design process when the site comes forward for development.

A replacement area of active open space can also be provided at Area 7 (See **Figure 5**) which could provide a total area of 3.98 ha of active open space in close proximity to another proposed residential area. This would balance the requested reduction to the area located in SLO4 and result in a net increase of 2.68 ha (3.98 ha -1.3ha) in the current provision in the Draft LAP.



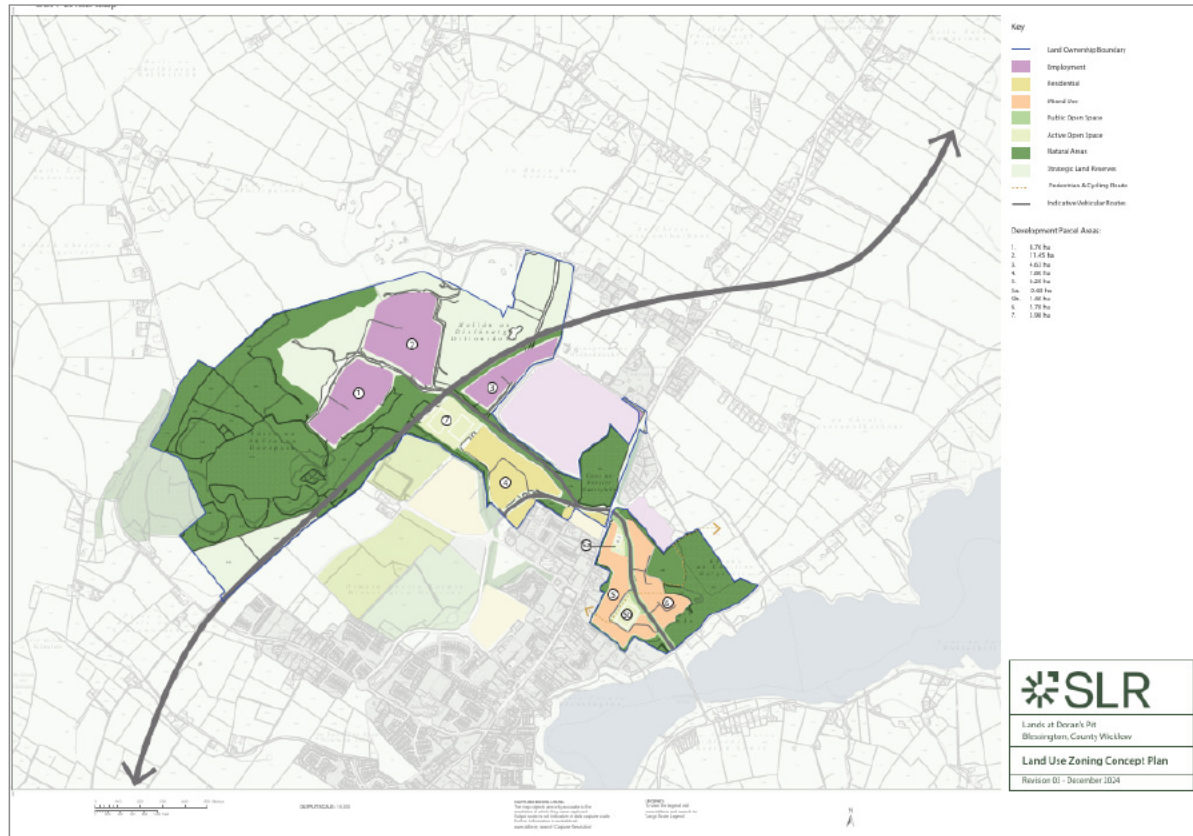


Figure 5 Land Use Zoning Concept Plan

3.2 Quarry Lands –East of the Proposed N81 / SLO3

Requested Amendment: Additional RN2 – New Residential Priority 2 and Active Open Space Zoning

The Draft LAP points to the topographical constraints of the quarry lands at Santryhill, Newpaddocks, Dillonstown and Deerpark, stating that remediation of parts of these lands has retained steep slopes and quarry faces in some instances, which may present difficulties in redeveloping these lands. It is stated that opportunities for development in these lands will be identified within the plan.

SLO3 partially encompasses the landholding of our clients with lands previously zoned for employment purposes. As part of the Draft LAP, there is a continuation of employment use with the lands south of SLO3 now rezoned as Natural Area (OS2).

In relation to the zoning for SLO3, we request

- The addition of employment land use zoning to the lands north of SLO3 between the SLO3 boundary and the proposed new N81 road, area currently zoned Extractive Industry (EI), refer to Area 3 on SLR Concept Plan (Figure 5).
- A change in the Employment zoning to Residential and Active Open Space, as shown on the SLR Concept Plan (Figure 5 - Areas 4 and 7). This would have the benefit of creating additional land for residential purposes together with an ancillary area of Active Open Space and facilities which would be complementary to an existing Sporting / Recreational Hub.

Whilst acknowledging that this residential area would form part of 'RN2 – New Residential Priority 2, this proposed residential zoned area (Figure 5 - Area 4) can be justified on the basis



of site suitability and compatibility with other nearby residential areas, providing additional residential capacity in light of the recent increase in housing targets.

This location can be considered on the basis that it can form part of a wider integrated housing / community facility / open space scheme that will be well connected to the existing built up area.

Area 7 would also provide a further 3.98 ha of active open space in close proximity to this residential area, balancing the requested reduction to the area located in SLO4. This approach would also ensure that the delivery of significant additional active open space for Blessington is not dependant on the development of a singular opportunity site.

As part of this request, zoning change to areas numbered 4 and 7 in **Figure 5** are sought. Currently both areas are zoned for employment use which can be provided on more suitable lands elsewhere in the Draft LAP area as per **Section 3.3** below.

3.3 Quarry Lands – West and East of the Proposed N81

Requested Amendment: Additional Employment Lands Zoning

Sand & gravel extraction is virtually completed at the quarry located west of the proposed N81 and the area that is currently zoned Extractive Industry is available for other beneficial use.

Employment land use zoning is requested for these lands (Areas 1 and 2 on the SLR Concept Plan, **Figure 5**), with the balance of the lands being considered strategic land for future development. This additional employment land area would replace the employment land being removed by the proposed residential and active open space zoning requested for SLO3, refer to **Section 3.2** above.

Given the strategic importance of Blessington in the context of employment provision, this area is ideally suited to further development for employment and economic purposes. Our client would like to point out that, where appropriate, land at this location can be regraded as needed to provide for future development.

It is therefore requested that a number of additional areas be considered for employment use. These areas are shown in **Figure 5** as Area 1 (8.76ha), 2 (11.45 ha) and 3 (4.63 ha) which would provide a total employment area of 24.84 ha or a net increase of 17.04ha. As more land is available beyond this area, it is also requested that the balance of the lands be considered as strategic land which can be reserved for future development beyond the lifetime of this LAP.



4.0 Concluding Remarks

4.1 Lands at Doran's Pit Processing Area East of Existing N81

It is welcomed that Wicklow County Council aims to capitalise on the biodiversity and amenity value of both the wooded area at Doran's Pit and the role that SLO4 can play in providing new links to the Poulaphouca Reservoir in line with Objective BLESS38. However, the indicative layout for SLO4 as set out in the Concept Plan is a significant concern for our client.

The proposed car park is not compatible with the fine grain of a proposed urban extension or protecting the ecological value of this 'Local Biodiversity Area'. Furthermore, the traffic implications for the proposed adjacent residential development have not been considered. The proposed link road through SLO4 connecting Kilbride Road and the N81 may attract a significant amount of traffic, especially considering its linkage with the forthcoming Blessington Inner Relief Road. The placement of this tourism facility may also add further pressure to this road and have negative implications on the proposed residential development.

On behalf of our client, we therefore request the omission of the Concept Plan under SLO4 and that the proposed 12ha of residential use be facilitated across the proposed mixed use zoning allocation rather than as proposed in the Concept Plan.

4.2 Quarry Lands –East of the Proposed N81 / SLO3

A change in the Employment zoning to Residential and Active Open Space, as shown on the SLR Concept Plan (Areas 4 and 7 in **Figure 5**) is sought and would have the benefit of creating a Sporting / Recreational Hub in conjunction with an existing Active Open Space area and facilities.

Whilst acknowledging that this residential area would form part of 'RN2 – New Residential Priority 2, this proposed residential zoned area (Area 4 in **Figure 5**) can be justified on the basis of site suitability and enhanced compatibility with other nearby residential areas (the employment zoning in the Draft LAP is not considered compatible with adjacent residential zoning). As residentially zoned land, this site will also provide additional residential capacity in light of the recent increase in housing targets.

Area 7 would also provide a further 3.98 ha of active open space in close proximity to this residential area and result in balancing the requested reduction to the area located in SLO4.

4.3 Quarry Lands – West and East of the Proposed N81

Employment land use zoning is requested for these lands (Areas 1 and 2 on the SLR Concept Plan -**Figure 5**). As more land is available beyond these areas, it is also requested that the balance of the lands be considered as strategic land which can be reserved for future development beyond the lifetime of this LAP. This additional employment land area would replace the employment land being removed by the proposed residential and active open space zoning requested for SLO3, refer to **Section 3.2** above.



4.4 Summary of Requested Amendments to the Draft LAP

A summary table of the requested amendments to the Draft LAP is provided below (refer to Land Use Concept Plan enclosed).

Ref	Area (ha)	Draft LAP Zoning	Requested Change
Area 1	8.76	Extractive Industry	Employment
Area 2	11.45	Extractive Industry	Employment
Area 3	4.63	Extractive Industry	Employment
Area 4	7.80	Employment	RN2 – New Residential Priority 2
Area 5	6.20	Mixed Use	Mixed Use
Area 5a	0.60	Mixed Use	Mixed Use
Area 5b	1.40	Mixed Use	Mixed Use
Area 6	5.78	Mixed Use	Mixed Use
Area 7	3.98	Employment	Active open space

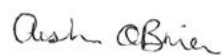
These requested changes would result in

- a net increase in active open space of 2.68 ha.
- a net increase in RN2 – New Residential Priority 2 zoning of 7.80 ha.
- a net increase in employment zoning of 17.04 ha.

Belgard Estates Ltd welcome Wicklow County Council's consideration of these requested changes in due course and look forward to engaging further with WCC in this regard. In the meantime, should you have any queries on the above submission, or wish to discuss any matter further, please do not hesitate to contact the undersigned.

Yours faithfully

SLR Consulting Ireland



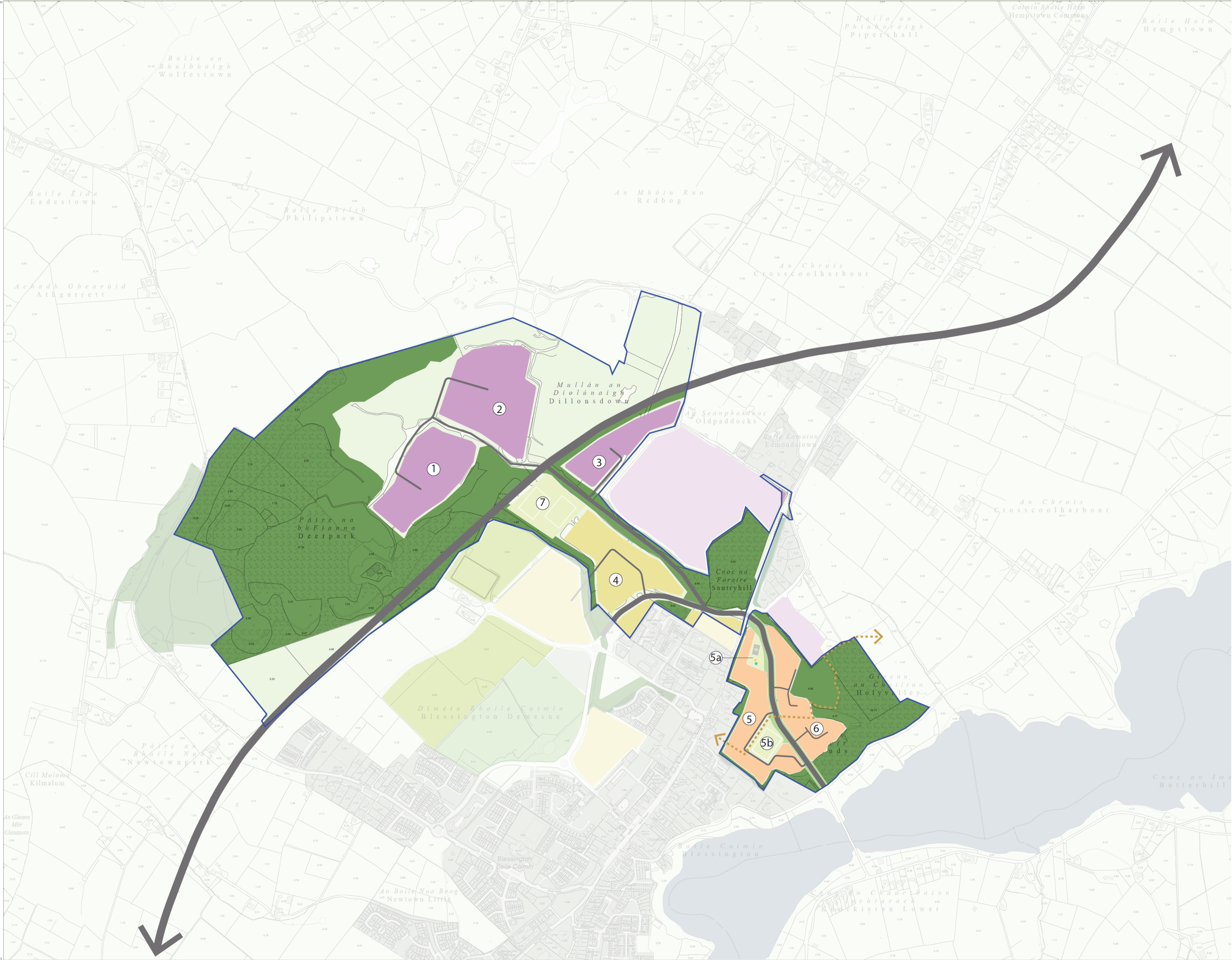
Aislinn O'Brien

Technical Director - Planning

Cc. Mr. R. Griffin (Belgard Estates Ltd.)

Enclosure: Land Use Concept Plan






Key

- Land Ownership Boundary
- Employment
- Residential
- Mixed Use
- Public Open Space
- Active Open Space
- Natural Areas
- Strategic Land Reserves
- Pedestrian & Cycling Route
- Indicative Vehicular Routes

Development Parcel Areas:

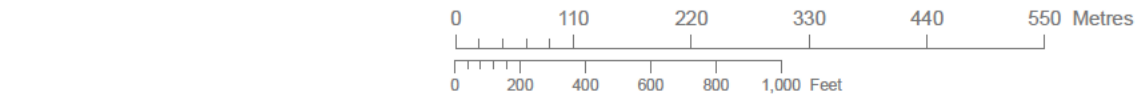
- 1. 8.76 ha
- 2. 11.45 ha
- 3. 4.63 ha
- 4. 7.80 ha
- 5. 6.20 ha
- 5a. 0.60 ha
- 5b. 1.40 ha
- 6. 5.78 ha
- 7. 3.98 ha



Lands at Doran's Pit
Blessington, County Wicklow

Land Use Zoning Concept Plan

Revision 03 - December 2024



OUTPUT SCALE: 1:5,000

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: www.taite.ie; search 'Capture Resolution'

LEGEND:
To view the legend visit www.taite.ie and search for 'Large Scale Legend'

