



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

Who are you:	Private Individual
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Topic

LAP - Proposed Material Amendments No 26 Submission

Submission

Submission Regarding Proposed Material Alteration No. 26 — Bellevue Demesne, Delgany

Dear Councillors,

I wish to formally object to Proposed Material Alteration No. 26, which seeks to rezone c.12.5 hectares at Bellevue Demesne to AOS – Active Open Space and to introduce a new Specific Local Objective for these lands.

While I fully recognise the importance of enhancing sporting facilities within the Greystones–Delgany area, the Bellevue lands are wholly unsuitable for this type of zoning. The proposal presents serious risks to environmental protection, archaeological heritage, landscape integrity, and public accessibility. My concerns are outlined below.

1. Environmentally Sensitive and Ecologically Critical Lands

The subject lands form part of a key nature corridor linking Delgany, Greystones, and the Glen of the Downs Nature Reserve, a designated European site. This corridor supports:

- mature hedgerows and native woodland
- wetland ecosystems
- protected and vulnerable species, including bats, owls, pine marten, red squirrels, and buzzard
- watercourses feeding into the Three Trout Stream system

Designating these lands for active recreational use would require extensive groundworks, levelling, drainage interventions, and lighting. Such works are incompatible with the County Development Plan's objectives relating to habitat protection, biodiversity connectivity, and safeguarding riparian corridors. The environmental sensitivity of this landscape cannot be overstated.

2. Risk to Water Quality and Violation of Riparian Buffer Requirements

2 / 4

The proposed access from Bellevue Hill would require crossing a watercourse known locally as the Brown Trout Stream. Any construction here would directly conflict with the Plan's requirement for core riparian buffers, which exist to protect water quality, aquatic species, and flood resilience.

Given the gradient of the site and its wetland characteristics, interventions of this scale would inevitably increase runoff, sedimentation, and pollution risk.

3. Significant Archaeological Sensitivity

Bellevue Hill lies just 500 metres from the discovery site of the 10th-century Delgany Viking Coin Hoard, one of the most important archaeological finds in the region. Historic records also identify this locality—traditionally known as Ballygunner—as a probable zone of Viking-era activity, including associations with Sihtric Silkenbeard's 1022 Battle of Delgany.

Given this proximity, any disturbance of ground through levelling, access creation, or pitch construction must trigger a full archaeological assessment prior to rezoning. The potential for undiscovered subsurface archaeology is exceptionally high.

4. Precedent for Future Development

Although the AOS zoning is intended for recreational use, recent rezonings within the County demonstrate that once lands are brought within the plan boundary, subsequent applications for ancillary or "once-off" development can follow.

Recent examples include:

- Delgany Golf Club (Material Alteration 31)
- Greystones Golf Club (Material Alteration 30)

Zoning such a substantial and sensitive tract of land at Bellevue risks creating a precedent that could unintentionally pave the way for further development in years to come. Once rezoned, these protections cannot be easily reinstated.

3 / 4

5. Limited Public Accessibility and Unsuitable Road Infrastructure

For sporting amenities to truly serve the community, they must be accessible to those who rely on walking,

cycling, or public transport.

Bellevue Hill, however:

- is a narrow rural road with no footpaths
- already accommodates more traffic than its design can safely support
- cannot safely absorb additional vehicle movements without major road upgrades — which would further compromise the landscape and biodiversity

It is difficult to reconcile the stated accessibility goals of the County Development Plan with the reality of placing major sports facilities in this location.

6. Issues with Specific Local Objective 12

The requirement that the lands remain “open to the public at all times” would necessitate extensive lighting, which is fundamentally incompatible with nocturnal wildlife habitats, including several protected bat species. The caveat that hedgerows will be protected only “insofar as possible” offers little certainty. In practice, access creation and pitch construction would require breaching mature vegetation, fragmenting habitats that have remained intact for generations.

Conclusion

The Bellevue lands are environmentally, archaeologically, and topographically unsuitable for Active Open Space zoning.

While increased sports provision is unquestionably needed, this must not come at the expense of one of the last intact natural corridors linking our towns with the Glen of the Downs.

I respectfully urge the Council to reject Proposed Material Alteration No. 26 and to prioritise alternative sites that are:

4 / 4

- accessible,
- environmentally robust,
- topographically appropriate, and
- aligned with the long-term sustainability aims of the County Development Plan.

Thank you for your careful consideration.

Kind regards,
Yasmin Fortune

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While I fully recognise the importance of enhancing sporting facilities within the Greystones–Delgany area, the Bellevue lands are wholly unsuitable for this type of zoning. The proposal presents serious risks to environmental protection, archaeological heritage, landscape integrity, and public accessibility. My concerns are outlined below.

1. Environmentally Sensitive and Ecologically Critical Lands

The subject lands form part of a key nature corridor linking Delgany, Greystones, and the Glen of the Downs Nature Reserve, a designated European site. This corridor supports mature hedgerows, native woodland, wetland ecosystems, and protected species including bats, owls, pine marten, red squirrels, and buzzard. Any works required to facilitate active recreation here would be incompatible with the County Development Plan's biodiversity and habitat protection objectives.

2. Risk to Water Quality and Violation of Riparian Buffer Requirements

The proposed access from Bellevue Hill would require crossing a watercourse known locally as the Brown Trout Stream. This would contradict the Plan's requirement for core riparian buffer zones, which protect water quality, aquatic species, and flood resilience.

3. Significant Archaeological Sensitivity

Bellevue Hill lies close to the discovery site of the 10th-century Delgany Viking Coin Hoard. Historical accounts indicate Viking-era activity in this area. Any ground disturbance must trigger a full archaeological assessment prior to rezoning.

4. Precedent for Future Development

Although AOS zoning is designated for recreation, comparable rezonings in the county have subsequently allowed ancillary development. Rezoning such a significant area at Bellevue could create long-term development pressure in a highly sensitive landscape.

5. Limited Public Accessibility and Unsuitable Road Infrastructure

Bellevue Hill is a narrow rural road with no pedestrian infrastructure. Locating major sports amenities here would require substantial road upgrades, contrary to environmental and safety considerations.

6. Issues with Specific Local Objective 12

The requirement that the lands remain open to the public at all times would necessitate extensive lighting, which is incompatible with nocturnal wildlife habitats. The caveat that hedgerows be protected only "insofar as possible" provides insufficient assurance and would lead to fragmentation of intact ecological corridors.

Conclusion

The Bellevue lands are environmentally, archaeologically, and topographically unsuitable for Active Open Space zoning. While increased sports provision is needed, it must not come at the expense of one of the last intact natural corridors linking our towns with the Glen of the Downs. I urge the Council to reject Proposed Material Alteration No. 26.

Kind regards,

Yasmin Fortune