



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

Who are you:	Private Individual
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File

Main Objection Letter to Proposal 26.pdf, 0.8MB

To Whom it May Concern,

With reference to proposal 26 to extend the town boundary by zoning 12.5 hectares of previous unzoned land on Bellevue Hill. As a resident of the lands at Bellevue Demesne that are proposed to be rezoned under Material Alteration No 26, where the site has been purchased by Eir Og GAA Club, who are now seeking to bring these lands inside the LPF boundary and zone them AOS - Active Open Space under a new Specific Local Objective (SLO -12 - Bellevue Hill).

The proposed alteration will have a direct and significant impact on the environment, water resources, biodiversity, nature and overall residential amenities.

For the reasons above, I object to the adoption of Proposed Material Alteration No 26

Please see below grounds for Objection:

1. Noise and Lighting:

Although we have been told that the proposed Eire Og Site will be used for only training sessions. Once a site is zoned AOS its usage can then be expanded over time.

Examples of this around County Wicklow and Dublin show just how AOS Lands can progress into:

- Flood-lit Pitches
- Full Training Complexes
- Clubhouse and Ancillary Buildings
- Night-time and Weekend Activities.
- Car Parks

Any increase in activity would result in:

- Persistent Noise, such as shouting, whistles, coaching and training drills.
- Light Pollution, particularly floodlights/floodlighting if they are installed.
- Evening and Weekend disturbance to the area
- Privacy issues for homeowners/landowners near the proposed site
- Skyglow would negatively affect the adjacent SAC.

2. Water supply and water table risk

One major concern which has not been assessed properly is, water supply and water table risk. The main area in Bellevue relies on a shared groundwater table and limited supply capacity.

- Bellevue contains natural springs, seepage slopes, and seasonal wetlands
- Levelling, drainage and engineered surfaces risk altering the water table.
- Increased runoff could erode slopes and carries sediment into the Three Trout Stream
- Hydrological disruption could negatively affect groundwater systems feeding the SAC and the glacial valley.

Eire Og's intended use means the following:

- Large amounts of players arriving multiple evenings during the week to train.
- A High-Water Consumption due to Shower facilities.
- Increase demand in water that cannot be supported locally.

3. Contamination and chemical risk to groundwater

The site sits on the same local aquifer that supplies multiple homes.

My concerns are as follows:

- The use of Fertilisers.
- Pesticides
- Herbicides
- Fungicides
- Growth Enhancers, and Pitch-Maintenance Chemicals
- Diesel or oil from maintenance machinery

4. Biodiversity, Ecology and Habitat Loss

The lands at Bellevue Hill are part of an ecological corridor feeding into the Glen of the Downs SAC/pNHA system.

The site in question contains the following:

- Wet Grassland
- Mature Hedgerows for nesting birds throughout the nesting season, which is vital as this allows the number of birds in Ireland to increase, especially species of birds that are on the Red List.

-Scrub and small woodland pockets.

- Protected Wildlife at Risk, the area is a habitat for Deer's, Pine Martens, Bats, Owls, Birds, Raptors, Red/Grey Squirrels, Badgers, Foxes, Hedgehogs, Pollinators and Amphibians. Disturbance or development would cause displacement and long-term habitat loss.

- Artificial lighting reduces bat activity by 50% to 90%
- Disrupts Owls Hunting and Breeding.
- Causes insect mortality and breaks nocturnal feeding cycles.

-A watercourse and drainage patterns that support downstream biodiversity

- Archaeological and Culture Landscape Value: Bellevue lies within a historically rich zone linked to Bronze Age ritual landscapes, early medieval Cuala, Viking Dyflinarskiri, and the La Touche heritage era. Fragmentation would permanently damage this culture landscape.

Zoning this as AOS and permitting the infrastructural works required for pitches (cut-and-fill, drainage, levelling) puts all of this at risk.

6. Landscape and Visual Character:

The land forms the rural buffer to Delgany, the nature dark-sky backdrop, and part of the glacial valley setting. AOS Zoning would introduce urbanisation, lighting, and infrastructure incompatible with the landscape.

5. Road safety, access and cumulative impact

Another concern is Road Safety, access and cumulative impact, Bellevue hill is already a narrow, steep and constrained road with:

- No safe pedestrian infrastructure, in fact the road is not wide enough for 2 large vehicles at certain pinch points on the road and proceeding up Bellevue Hill.
- Poor lighting on Bellevue Road
- Excess speed is also a factor. Although the speed limit is 50km on Bellevue Hill/Road, some road users go at faster speeds which is another safety concern.
- Tight visibility
- NO parking
- Existing traffic pressure on Bellevue Hill due to major developments along the road which has put huge pressure on the road due to traffic issues exiting and entering the road.

Bringing hundreds of players and parents into this area several times a week is incompatible with the character and carrying capacity of the road. The footpath requirement in SLO 12 is not

enough. Even with a footpath, the geometry of the road and the proximity to the Glen of the Downs make this unsuitable for high-frequency sporting activity.

6. Conflict with EU Law:

The rezoning contradicts obligations under the Habitats Directive, Birds Directive, Water Framework Directive, SEA/EIA Directives, the Aarhus Convention and the EU Nature Restoration Law (2024). These require the protection of Ecological corridors, prevention of habitat deterioration, and safeguarding areas adjoining Natura 2000 sites.

7. Risk of precedent and zoning creep

My concern is once you create an AOS block here, future Councils or private applicants may seek to extend, intensify, or partially rezone it. The risk is real, evidenced and already occurring elsewhere in this LPF. Once the boundary moves, it rarely moves back.

Material Alteration 26 is inconsistent with

- -Wicklow County Development Plan
- -Green infrastructure protection
- -Biodiversity and habitat conservation
- -Protection of rural landscape character
- -Sustainable water resource management
- -National Biodiversity Action Plan 2023–2030
- -Mandates avoidance of unnecessary habitat loss
- -Requires strengthening of ecological networks

Based on all of the above, I request you do NOT adopt Proposed Material Alteration No. 26. Leave the land outside the LPF boundary and retain its current rural/natural status.

I am in full support for local sports and community activity, but this proposal is in the wrong location, lacks the environmental and hydrological assessments required, fails to safeguard residential amenity, and introduces unacceptable risks to the water table, biodiversity and rural character of the area.

For these reasons, I urge the Council not to adopt Material Alteration No. 26.

Yours sincerely,

Louise Barry

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