



# Draft Blessington Local Area Plan Submission - Report

Who are you:	Agent
Name:	Joan and Billy Flynn
Reference:	DBLESSLAP-150523
Submission Made	November 29, 2024 3:11 PM

## Topic

Land Use Zoning / Specific Local Objectives / Land Use Zoning Map

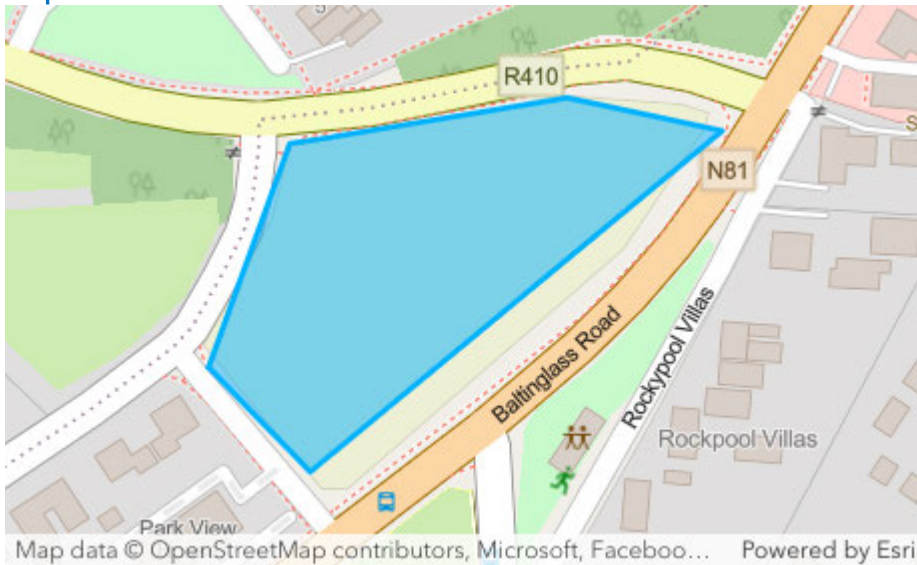
## Submission

This submission addresses a land parcel that is located at the junction between the N81 and the R410 Naas Road. The land is currently zoned 'Town Centre'. In the draft plan it is proposed to zone the site 'OS1 - Open Space'.

- It is clear that the proposed zoning objective envisages a public use on the subject site. However, the land is privately owned.
- No rationale is provided in the draft plan for removing the current Town Centre zoning objective.
- The site is not of such specific biodiversity value that would justify retaining it in its current natural state.
- An open space audit of open space needs that is related to the catchment population should take into account the available open space facilities both inside and outside the town but within the catchment area.
- The Audit fails to include a qualitative assessment of current open space facilities provided in the town.
- The recommended figure of 9.3 ha to be zoned for additional OS1 'Open Space' use is flawed and should be corrected because it is based on comparison with existing zoned lands rather than existing facilities.
- The fact that planning permission was refused should not form a reason to give up on the objective to seek an active town centre use on the subject site.
- Zoning the land for open space removes the future development of this site as an opportunity site within the town with potential for a landmark building or buildings.

The planning authority is urged to reconsider the proposed zoning objective and decide to maintain the current Town Centre zoning objective in the interest of the proper planning and sustainable development of Blessington town.

### Map



### Site Description:

A land parcel that is located at the junction between the N81 and the R410 Naas Road.

---

### File

Submission Joan and Billy Flynn.doc, 2.01MB

*Hendrik W van der Kamp, MScEng, FIPI, MIEI*  
*Town Planner*  
*1, Woodstown Court*  
*Knocklyon*  
*Dublin 16*  
*Tel: 087 2020387 E-mail: hendrikwvanderkamp@outlook.com*

**Submission to Draft Blessington Local Area Plan**

**November 2024**

**Contents**

	Page
1 Introduction	2
2 OS1 Zoned Lands	2
3 No Rationale for the Change in Zoning Objective	2
4 Social Infrastructure Audit is Flawed	3
5 The Audit Uses Incorrect Population Figures	3
6 Lack of Qualitative Analysis	4
7 Existing Facilities vs Existing Zoned Lands	4
8 Planning History	5
9 Strategic Nature of the Site for Townscape	6
10 Biodiversity Value of the Subject Site	6
11 Conclusion	7

Appendix A – Map of Subject Lands

## 1 Introduction

This submission is made in response to the invitation by Wicklow County Council to make submissions on the Draft 'Blessington Local Area Plan 2025'.

This submission is made on behalf of Joan and Billy Flynn, [REDACTED]  
[REDACTED]

This submission addresses a land parcel that is located at the junction between the N81 and the R410 Naas Road. The land is currently zoned 'Town Centre'.<sup>1</sup> In the draft plan it is proposed to zone the site 'OS1 - Open Space'.<sup>2</sup>

## 2 OS1 Zoned Lands

The OS1 zoning objective is: *... "To protect and enhance existing and provide for recreational open space."*<sup>3</sup> The description is as follows: *... "Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public."*<sup>4</sup>

According to the draft Local Area Plan *... "Uses appropriate for open space (OS1) zoned land are recreational uses such as formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas, outdoor gyms, and allotments."*<sup>5</sup>

**Based on this description it is clear that the draft Local Area Plan envisages a public use on the private land. However, the land is privately owned.**

## 3 No Rationale for the Change in Zoning Objective

The written statement of the draft Local Area Plan provides no information that makes it possible to find out the reason or reasons for changing the zoning objective from 'town centre' to 'open space'.

The plan lists a total of 39 hectares zoned for open space. This is divided between 7 areas of which the subject site forms one.<sup>6</sup> The other six areas of open space zoned lands were either in open space use already or zoned for open space in the previous

<sup>1</sup> *Blessington Local Area Plan 2013-2019*, Map 1 – Land Use Zonings.

<sup>2</sup> *Draft Blessington Local Area Plan 2025*, Map 1 – Land Use Zoning Objectives.

<sup>3</sup> *Draft Blessington Local Area Plan 2025*, p. 62.

<sup>4</sup> *Draft Blessington Local Area Plan 2025*, p. 62.

<sup>5</sup> *Draft Blessington Local Area Plan 2025*, p. 63.

<sup>6</sup> *Draft Blessington Local Area Plan 2025*, p. 50.

local area plan. The zoning of the subject site for Open Space adds only one hectare of land to the total area of open space in the town.

No rationale is given in the draft plan why the current Town Centre zoning objective should be removed from the subject site.

**No rationale is provided in the written statement to explain the need for adding the subject site to the land that was previously zoned open space and removing the current Town Centre zoning objective.**

#### **4 Social Infrastructure Audit is Flawed**

It is noted that the Office of the Planning Regulator made comments on the Issues Paper and in that context suggested the preparation of a Social Infrastructure Audit: *...“the LAP should be informed by a social or civic infrastructure audit to establish the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents, and identify the need for any additional facilities.”*<sup>7</sup>

The planning authority did complete a Social Infrastructure Audit. According to the draft Local Area Plan, the need for the amount of open space zoned land is based on the Social Infrastructure Audit that was carried out for the town. The Social Infrastructure Audit forms part of the planning documentation that is on public display.

The Social Infrastructure Audit concludes that there is a current demand for open space lands in the town that is not met. Based on an analysis of demand for open space that is related to the population size, the Audit concludes that there is a current shortfall of 7.68 hectares which will increase to 9.28 hectares over the period of the Local Area Plan.<sup>8</sup> This analysis appears to be based on incorrect calculations.

**Based on a calculated shortfall the Audit concludes that 9.3 ha should be zoned for additional OS1 ‘Open Space’ use.<sup>9</sup> However, this analysis is flawed for the reasons set out in the following sections.**

#### **5 The Audit Uses Incorrect Population Figures**

The calculation of the amount of open space to be provided per 1000 population, is based on section 8.1 of the Wicklow County Development Plan 2022-2028.

---

<sup>7</sup> Letter Office of the Planning Regulator 3/4/24, p. 6.

<sup>8</sup> *Draft Blessington Local Area Plan 2025 – Social Infrastructure Audit*, p. 58.

<sup>9</sup> *Draft Blessington Local Area Plan 2025 – Social Infrastructure Audit*, p. 59.

According to the Social Infrastructure Audit the Development Management Standards in that section require the following provision of open space per 1000 population:

- 1.6ha outdoor play space (pitches, courts, sports grounds)
- 0.6ha casual play spaces (parks)
- 0.2ha equipped play space (playgrounds and MUGAs).<sup>10</sup>

To carry out the analysis the Audit adopts a population figure of 15,000 as the current population and 17,000 as the future population. However, these population figures relate to the *catchment area*, not the *town area*. The population target for the town for 2031 is 6,313 population. Whereas the additional 9.3 hectares of zoned lands are all located within the town boundary, many of the existing open space facilities that serve the catchment population are provided outside the town. This is acknowledged on page 52 of the Audit report.

**An open space audit of open space needs that is related to the catchment population should take into account the available open space facilities within the catchment area both inside and outside the town.**

## 6 Lack of Qualitative Analysis

The audit concludes a current shortfall of open space of 7.68 hectares. However, this is based on a *quantitative* analysis using county wide development standards without a *qualitative* survey of use and demand amongst the population of existing facilities.

In February 2023, Wicklow County Council published a commissioned report into the community and recreational needs of the Baltinglass Municipal District.<sup>11</sup> In contrast to the analysis in the Audit, this survey used qualitative as well as quantitative criteria. While it is noted that the survey mentioned the need for specific facilities (including a swimming pool and a football field) no reference is made to dissatisfaction with the quality of open space in the town.

**The Audit fails to include a qualitative assessment of current open space facilities provided in the town.**

## 7 Existing Facilities vs Existing Zoned Lands

Of the additional areas of OS1 zoned lands in the draft Local Area Plan, the two largest areas that are proposed to be zoned as such, were already zoned for open space in the current Local Area Plan. These lands have been zoned 'open space' since 2013, more than ten years ago. These are: New Town Park (15.3 ha) and the SLO1 area (3.9 ha).<sup>12</sup> These two areas have not been developed to date. Combined

<sup>10</sup> *Draft Blessington Local Area Plan 2025 – Social Infrastructure Audit*, p. 58.

<sup>11</sup> *Draft Blessington Local Area Plan 2025 – Social Infrastructure Audit*, p. 57.

<sup>12</sup> *Draft Blessington Local Area Plan 2025*, p. 50.

they provide more than  $15.3+3.9=19.2$  hectares, or more than double the amount of the future shortfall (9.3 ha).

The audit is unclear whether the increase of 9.3 hectares of OS1 zoned lands is in addition to *existing facilities* or in addition to *existing zoned lands*. The unmet current demand for open space as stated on page 58 of the Audit document, is based on an assumed existing provision of 13 hectares ( $8.72+4.15+0.17$ ). This existing provision relates not to existing zoned lands but to existing open space. According to the figure 2.10 in the SIA the two large areas of OS1 zoned lands (New Town Park and the SLO1 area) are not existing facilities. According to the accompanying table, a part of the New Town Park is included (3.61 hectares) because it is under construction, but not the SLO1 area. It can therefore be concluded that the existing area of open space as listed on page 55 of 13 hectares is existing facilities, not existing zoned land in the current LAP (which has now expired).

It is therefore clear that the future additional supply needed to accommodate the increased population demand and current shortfall, can be more than adequately met with the new town park and the SLO1 area and there is no need whatsoever to add additional open space zoned lands to the lands that are already zoned for open space in the current plan.

**The recommended figure of 9.3 ha to be zoned for additional OS1 'Open Space' use is flawed and should be corrected because it is based on comparison with existing zoned lands rather than existing facilities.**

## **8 Planning History**

Planning permission was sought in 2023 on the subject site for a supermarket with ancillary off-licence sales area, primarily in a single storey structure with a first-floor area for staff facilities. Planning permission was refused for three reasons of refusal relating to the single retail use, design issues and traffic and transport assessment.<sup>13</sup> It is clear from the decision that the planning authority sought an active town centre use for the site with active facades contributing to the vibrancy and vitality of Blessington town centre. The decision was not appealed.

**The fact that planning permission was relatively recently refused should not form a reason to abandon the objective to seek an active town centre use on the subject site.**

---

<sup>13</sup> Planning reference 23/60307.

## 9 Strategic Nature of the Site for Townscape

Blessington is an example of a town based on a central main street where the main focus of commercial activity is located along the central main street that runs in northeast to southwest direction. As the town centre has grown over time, expansion has generally taken place in a northern and southern direction rather than east or west on land to the rear of existing development on the Main Street.

The site provides an ideal opportunity to ‘frame’ the Main Street town centre core at its south western end by providing a building on the site with an elevation facing towards the Main Street. Under such a policy a clear ‘end’ to the town centre would be signalled instead of the gradual approach under the current proposals.

A building or combination of buildings on the subject site with an attractive elevation facing this area of open space provides an opportunity to develop a high quality ‘urban space’ that would be enclosed rather than adjoined by a surface car park as proposed in the Local Area Plan. These ideas were clearly represented in the planner’s assessment of the previous development proposal that was refused planning permission. This report refers to the site as an ‘opportunity site’ which is suitable for a ‘landmark building’.<sup>14</sup>

**Zoning the land for open space removes the future development of this site as an opportunity site within the town with potential for a landmark building or buildings.**

## 10 Biodiversity Value of the Subject Site

One possible reason for removing the Town Centre zoning objective from the Local Area Plan zoning map, might be the consideration that the site is of high biodiversity value making it unsuitable for development and justifying retaining it in its current undeveloped natural state.

It is noted that the site is included as a ‘Local Biodiversity Area’ forming part of the Green Infrastructure for the town.<sup>15</sup> This designation is not justified. An Ecological Impact Assessment was carried out in September 2023. This assessment was carried out as part of the planning application for the site and its objectives were, *inter alia*, the following: ...”Undertake a baseline ecological feature, resource and function assessment of the site and zone of influence”.<sup>16</sup>

The conclusion of the Ecological Impact Assessment states: ...”*The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on the sensitive receptors through the application the standard construction and operational phase controls. The overall impact on the*

<sup>14</sup> Planner’s report, pl. ref. 23/60307, 13/11/23, p. 16.

<sup>15</sup> *Draft Blessington Local Area Plan 2025*, Map no. 3, Key Green Infrastructure.

<sup>16</sup> *Ecological Impact Assessment (EclA)*, pl. ref. 23/60307, dated 25/9/23, p. 4.



*ecology of the proposed development will result in a long term minor adverse not significant residual impact on the ecology of the area and locality overall.*<sup>17</sup>

It is clear that the site is capable of accommodating commercial development subject to standard mitigation measures. This is confirmed also by the fact that the refusal reasons for the proposed development did not include concerns about impact on ecology or biodiversity.

**The site is not of special value in terms of biodiversity that would justify to retain its current natural state or include it in the Green Infrastructure for the town.**

## **11 Conclusion**

- **It is clear that the proposed zoning objective envisages a public use on the subject site. However, the land is *privately owned*.**
- ***No rationale* is provided in the draft plan for removing the current Town Centre zoning objective.**
- **The site is not of such specific biodiversity value that would justify retaining it in its current natural state.**
- **An open space audit of open space needs that is related to the catchment population should take into account the available open space facilities *both inside and outside the town* but within the catchment area.**
- **The Audit fails to include a *qualitative* assessment of current open space facilities provided in the town.**
- **The recommended figure of 9.3 ha to be zoned for additional OS1 'Open Space' use is flawed and should be corrected because it is based on comparison with existing *zoned lands* rather than existing *facilities*.**
- **The fact that planning permission was refused should not form a reason to give up on the objective to seek an active town centre use on the subject site.**
- **Zoning the land for open space removes the future development of this site as an *opportunity site* within the town with potential for a landmark building or buildings.**

**The planning authority is urged to reconsider the proposed zoning objective and decide to maintain the current Town Centre zoning objective in the interest of the proper planning and sustainable development of Blessington town.**

---

<sup>17</sup> *Ecological Impact Assessment (EclA)*, pl. ref. 23/60307, dated 25/9/23, p. 49.

Please direct all correspondence to the undersigned,

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Hendrik W van der Kamp', written in a cursive style.

---

Hendrik W van der Kamp.

Appendix A – Map of Subject Lands

