



**THORNTON O'CONNOR**  
TOWN PLANNING

# **Planning Report and Statement of Consistency**

**Prepared in Respect of a Planning Application  
for a Large-Scale Residential Development  
(LRD) at a Site of 6.05 Ha in Blessington, Co.  
Wicklow**

**On Behalf of Marshall Yards Development  
Company Limited**

November 2024

## CONTENTS

|            |  |           |
|------------|--|-----------|
| <b>1.0</b> | <b>INTRODUCTION.....</b>   | <b>1</b>  |
| 1.1        | Large-Scale Residential Development.....   | 1         |
| 1.2        | Status of the <i>Blessington Local Area Plan 2013–2019</i> and Validity of Lodging this Planning Application ..... | 2         |
| 1.2.1      | Status of the <i>Blessington Local Area Plan 2013–2019</i> .....   | 2         |
| 1.2.2      | Zoning and Development Potential of Lands as they Pertain to an LRD.....   | 3         |
| 1.2.3      | The Role of the “ <i>Planning Authority</i> ” and the Board’s Role in Considering Planning Applications .....      | 5         |
| 1.2.4      | Important Precedents in the Validation and Assessment of LRDs and Development on Perceived ‘Unzoned’ Lands.....    | 5         |
| 1.2.5      | Concluding Remarks on the Local Area Plan’s Status and the Validity of Planning Applications .....                 | 9         |
| 1.3        | Summary of the Proposed Development.....   | 9         |
| 1.4        | Previous Consultation with Wicklow County Council .....  | 10        |
| 1.5        | Purpose and Structure of this Report.....  | 10        |
| <b>2.0</b> | <b>SITE LOCATION, DESCRIPTION, CONTEXT AND ACCESSIBILITY .....</b>   | <b>11</b> |
| 2.1        | Site Location and Description.....   | 11        |
| 2.2        | Site Context.....  | 11        |
| 2.3        | Site Accessibility.....  | 12        |
| 2.3.1      | Active Modes .....   | 12        |
| 2.3.2      | Public Transport.....  | 13        |
| <b>3.0</b> | <b>PLANNING HISTORY .....</b>  | <b>14</b> |
| 3.1        | Planning History of the Subject Site .....   | 14        |
| 3.1.1      | Reg. Ref. 20362 – Residential Development.....   | 14        |
| 3.1.2      | Reg. Ref. 20184 – Nursing Home and Residential Development.....  | 16        |
| 3.2        | Importance of the Site’s Planning History.....   | 18        |
| <b>4.0</b> | <b>PREVIOUS CONSULTATION WITH WICKLOW COUNTY COUNCIL .....</b>   | <b>19</b> |
| 4.1        | Section 247 PPC.....   | 19        |
| 4.1.1      | Matters Raised and Design Team Summary Responses .....   | 19        |
| 4.2        | Section 32C LRD Meeting .....  | 23        |
| 4.2.1      | LRD Meeting and Opinion and Response to Matters Raised.....  | 23        |
| <b>5.0</b> | <b>DEVELOPMENT DESCRIPTION .....</b>   | <b>24</b> |
| 5.1        | Key Site and Development Statistics .....  | 24        |
| 5.2        | Description of Proposed Development .....  | 24        |
| 5.3        | Understanding the Design Concept.....  | 29        |
| 5.4        | Description of Landscape Proposal.....   | 29        |
| <b>6.0</b> | <b>STATEMENT OF CONSISTENCY .....</b>  | <b>30</b> |
| 6.1        | <i>Project Ireland 2040: National Planning Framework</i> .....   | 30        |
| 6.2        | <i>Urban Development and Building Heights – Guidelines for Planning Authorities</i> .....                          | 34        |
| 6.3        | <i>Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities</i> .....  | 35        |
| 6.4        | <i>Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities</i> .....     | 37        |
| 6.5        | <i>The Planning System and Flood Risk Management: Guidelines for Planning Authorities</i> .....                    | 44        |
| 6.6        | <i>Design Manual for Urban Roads and Streets</i> .....   | 44        |
| 6.7        | <i>Childcare Facilities: Guidelines for Planning Authorities</i> .....   | 45        |

|            |  |            |
|------------|--|------------|
| 6.8        | <i>Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities</i>              | 46         |
| 6.9        | <i>Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019–2031</i>                    | 46         |
| 6.10       | <i>Wicklow County Development Plan 2022–2028</i>   | 48         |
| 6.10.1     | Chapter 4 – Settlement Strategy  | 48         |
| 6.10.2     | Chapter 5 – Placemaking for Town and Village Centres   | 50         |
| 6.10.3     | Chapter 6 – Housing  | 54         |
| 6.10.4     | Chapter 7 – Social & Community Development   | 64         |
| 6.10.5     | Chapter 8 – Built Heritage   | 68         |
| 6.10.6     | Chapter 9 – Economic Development   | 70         |
| 6.10.7     | Chapter 10 – Retail  | 71         |
| 6.10.8     | Chapter 12 – Sustainable Transportation  | 75         |
| 6.10.9     | Chapter 13 – Water Services  | 79         |
| 6.10.10    | Chapter 14 – Flood Risk Management   | 81         |
| 6.10.11    | Chapter 15 – Waste & Environmental Emissions   | 84         |
| 6.10.12    | Chapter 16 – Energy Infrastructure & Communications  | 86         |
| 6.10.13    | Chapter 17 – Natural Heritage & Biodiversity   | 87         |
| 6.10.14    | Chapter 18 – Green Infrastructure  | 95         |
| 6.11       | <i>Blessington Local Area Plan 2013–2019</i>   | 96         |
| 6.11.1     | Section 2 – Population and Housing   | 97         |
| 6.11.2     | Section 3 – Town Centre Strategy and Retail  | 97         |
| 6.11.3     | Section 4 – Employment & Enterprise  | 98         |
| 6.11.4     | Section 5 – Tourism  | 98         |
| 6.11.5     | Section 6 – Social Infrastructure  | 99         |
| 6.11.6     | Section 7 – Service Infrastructure   | 99         |
| 6.11.7     | Section 8 – Built and Natural Heritage   | 101        |
| <b>7.0</b> | <b>PLANNING POLICY CONTEXT AND ASSESSMENT</b>  | <b>103</b> |
| 7.1        | Land-Use Zoning  | 103        |
| 7.1.1      | Permitted in Principle Uses and Justifying the Proposed Uses   | 104        |
| 7.1.1.1    | Uses on the R1-Zoned Portion of the Site   | 105        |
| 7.1.1.2    | Uses on the TC-Zoned Portion of the Site   | 105        |
| 7.1.2      | Precedent for Granting Planning Permission for Wholly Residential Development on TC-Zoned Lands in Blessington | 106        |
| 7.1.3      | Other Town Centre Zoned Sites Available for Development  | 107        |
| 7.1.4      | Note on Development at the OS-Zoned Portion of the Site  | 108        |
| 7.2        | Core Strategy  | 108        |
| 7.3        | Built-Form: Plot Ratio, Site Coverage and Building Height  | 111        |
| 7.3.1      | Plot Ratio and Site Coverage   | 111        |
| 7.3.2      | Building Height  | 111        |
| 7.4        | Residential Density  | 114        |
| 7.4.1      | Policy Basis   | 114        |
| 7.4.2      | Proposing and Calculating Density  | 116        |
| 7.5        | Separation Distances   | 118        |
| 7.6        | Dwelling Mix   | 119        |
| 7.7        | Dwelling Design and Amenity  | 122        |
| 7.7.1      | Internal Floor Areas   | 122        |
| 7.7.2      | Universal Design   | 123        |
| 7.7.3      | Private Amenity Space  | 124        |
| 7.7.4      | Aspect   | 125        |
| 7.7.5      | Floor-to-Ceiling Heights   | 126        |
| 7.7.6      | Storage  | 126        |
| 7.7.7      | Daylight and Sunlight  | 127        |

|            |  |            |
|------------|--|------------|
| 7.8        | Parking .....  | 129        |
| 7.8.1      | Car Parking.....   | 129        |
| 7.8.2      | Cycle Parking .....                                      | 131        |
| 7.9        | Landscaping and Open Space.....                          | 132        |
| 7.9.1      | Open Space in the Main Residential Site Area .....       | 132        |
| 7.9.1.1    | Public Open Space .....                                  | 132        |
| 7.9.1.2    | Communal Amenity Space.....                              | 133        |
| 7.9.1.3    | Private Open Space.....                                  | 134        |
| 7.9.2      | Open Space in the Mixed-Use Part of the Site (LLUs)..... | 134        |
| 7.10       | Flood Risk .....   | 135        |
| 7.11       | Archaeology .....  | 136        |
| 7.12       | Ecology and the Environment.....                         | 138        |
| 7.12.1     | Ecological Impact Assessment .....                       | 138        |
| 7.12.2     | Appropriate Assessment .....                             | 139        |
| 7.12.3     | Environmental Impact Assessment .....                    | 139        |
| 7.13       | Part V .....   | 140        |
| <b>8.0</b> | <b>PLANNING ADMINISTRATION.....</b>                      | <b>141</b> |
| <b>9.0</b> | <b>CONCLUSION .....</b>                                  | <b>149</b> |

Wicklow County Council  
County Buildings  
Whitegates  
Wicklow Town  
Co. Wicklow

Friday, 8<sup>th</sup> November 2024

Dear Sir/Madam,

**RE: PLANNING APPLICATION FOR A PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT (LRD) AT A SITE OF 6.05 HA IN BLESSINGTON, CO. WICKLOW**

## **1.0 INTRODUCTION**

Thornton O'Connor Town Planning<sup>1</sup>, in association with Deady Gahan Architects<sup>2</sup>, DBFL Consulting Engineers<sup>3</sup>, Ilsa Rutgers Landscape Architecture<sup>4</sup>, Waterman Moylan<sup>5</sup>, CMK Horticulture and Arboriculture Limited<sup>6</sup>, IAC<sup>7</sup>, Openfield<sup>8</sup>, JBA Consulting<sup>9</sup> (JBA), 3D Design Bureau<sup>10</sup> (3DDB), Byrne Environmental<sup>11</sup> and Sabre Electrical Services Limited<sup>12</sup>, have been retained by Marshall Yards Development Company Limited<sup>13</sup> (the Applicant) to prepare and submit this Planning Application for a Large-scale Residential Development (LRD) to Wicklow County Council (WCC). In summary, the LRD comprises 269 No. residential units (233 No. 'standard' dwellings and 36 No. 'Later Living Units' (LLUs)), medical centre, café and pharmacy at a site of 6.05 Ha in Blessington, Co. Wicklow.

## **1.1 Large-Scale Residential Development**

It should be noted that the proposed development is classified as an LRD as defined under the *Planning and Development (Amendment) (Large-Scale Residential Development) Act 2021*:

---

<sup>1</sup> No. 1 Kilmacud Road Upper, Dundrum, Dublin 14

<sup>2</sup> Eastgate Village Retail Park, Little Island, Cork

<sup>3</sup> Ormond House, Upper Ormond Quay, Dublin 7

<sup>4</sup> No. 2 Lincoln Pl, Grattan Hill, Tivoli, Cork

<sup>5</sup> Block S, East Point Business Park, Dublin 3

<sup>6</sup> Drumone, Oldcastle, Co. Meath

<sup>7</sup> Unit G1, Network Enterprise Park, Kilcoole, Co. Wicklow

<sup>8</sup> No. 12 Maple Avenue, Carpenterstown, Dublin 15

<sup>9</sup> No. 24 Grove Island, Corbally, Limerick

<sup>10</sup> Unit 1, Adelphi House, George's Street Upper, Dun Laoghaire, Co. Dublin

<sup>11</sup> Red Bog, Skryne Road, Dunshaughlin, Co. Meath

<sup>12</sup> Unit 11, Bellview Industrial Estate, Tolka Valley Road, Dublin 11

<sup>13</sup> Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co. Kildare

- "a) the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;**
- b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;
- c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or
- d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c).

where the LRD floor space of—

- (i) **in the case of paragraph (a), the buildings comprising the houses,**
- (ii) *in the case of paragraph (b), the student accommodation,*
- (iii) *in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation,*

***is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development."* [emphasis added]**

As the proposed development includes 269 No. residential units (233 No. 'standard' units and 36 No. LLUs) and medical centre, café and pharmacy uses which do not exceed 30% of the overall floor area, it is, therefore, considered to be an LRD.

## **1.2 Status of the *Blessington Local Area Plan 2013–2019* and Validity of Lodging this Planning Application**

### **1.2.1 Status of the *Blessington Local Area Plan 2013–2019***

It is noted that Wicklow County Council on their website refer to a Proposed Variation 3 to the *Wicklow County Development Plan 2002-2008*. The website text states:

*"Variation No. 3 (Blessington LAP) to the County Development Plan 2022-2028 will be on display here in the coming weeks."*

With regard to the status of the current Blessington Local Area Plan (2013-2019), we have noted a number of recent decisions on LRD Planning Applications in Blessington (and elsewhere in County Wicklow) have been issued a Notification of Decision to Grant Permission by Wicklow County Council and ultimately refused Permission by the Board on Appeal. This is due to the stance of An Bord Pleanála that the relevant Local Area Plan or Town Development Plan has expired. Thus, they concluded that the *"...development is not consistent with the legislative preconditions for an LRD application."* Specifically, this applies to both Reg. Ref. 23/60219 (ABP Ref. 319137) in Rathnew and Reg. Ref. 23/689 (ABP Ref. 319657) in Blessington, where WCC initially Granted Planning Permissions prior to An Bord Pleanála's refusals.

However, the instruction and direction we have received from WCC to-date is that the *Blessington Local Area Plan 2013–2019* remains applicable and relevant to the assessment of Planning Application in the settlement. To bolster this, we draw from the detail in the LRD Opinion, which emphasised the need to comply with the LAP's zoning, policies and objectives. Further still, we note the following statement made by WCC in response to a query from An Bord Pleanála regarding the status of the *Wicklow Town-Rathnew Development Plan 2013* (Reg. Ref. 23/60219 (ABP Ref. 319137)):

*"It is the position of the Planning Authority that the Wicklow Town-Rathnew Development Plan 2013 is an applicable development plan relating to the subject site, in addition to the County Development Plan 2022."*

Similarly, we note the following statement made by WCC in response to a query from An Bord Pleanála regarding the status of the *Blessington Local Area Plan 2013–2019* (Reg. Ref. 23/689 (ABP Ref. 319657)):

*"It is the position of the Planning Authority that the Blessington Local Area Plan 2013 is an applicable Plan relating to the subject site, in addition to the County Development Plan 2022."*

Consequently, we contend that the LAP remains relevant to the subject site and guides its zoning and development potential.

### 1.2.2 Zoning and Development Potential of Lands as they Pertain to an LRD

Notwithstanding the position that the *Blessington Local Area Plan 2013–2019* remains applicable from the perspective of Wicklow County Council – **the relevant Planning Authority** – we are mindful that An Bord Pleanála contended in their reasons for refusing the above 2 No. Planning Applications that the relevant local plans had expired, thus leaving the relevant settlements and Application sites without a formal zoning. Referring to Section 32A(1) and (2)(b)(ii) of the *Planning and Development Act 2000* (as amended), the Board included Reasons for Refusal stating that the:

*"...proposed development is not consistent with the legislative preconditions for an LRD application, insofar as it is not on land the zoning of which facilitates its use for the purposes proposed in the application. In this context, the Board is precluded from granting permission for this... proposed development."*

For absolute clarity, the cited Section of the Act states:

"32A.— (1) A person who intends to apply for permission under this Part—  
(a) for large-scale residential development,  
(b) on land—  
(i) that is not located in a strategic development zone, and  
(ii) **the zoning of which facilitates its use for the purposes proposed in the application,**

*(referred to in this Act as a "prospective LRD applicant") shall not make the application unless at that time he or she holds an LRD opinion, or written confirmation referred to in section 247(7), in relation to the proposed LRD provided not more than 6 months before the date of the application.*

(2) A **planning authority** shall refuse to consider an application for permission—

(a) for large-scale residential development,  
(b) on land—

(i) that is not located in a strategic development zone, and  
(ii) **the zoning of which facilitates its use for the purposes proposed in the application,**

*unless it is satisfied that the applicant holds an LRD opinion, or written confirmation referred to in section 247(7), in relation to the proposed LRD provided not more than 6 months before the date of the application.” [emphasis added]*

Evidently, the above wording implies that an Applicant may only submit a Planning Application and the **Planning Authority** may only accept and assess same if:

- (1) The development aligns with the LRD definition;
- (2) The development is on land outside an SDZ;
- (3) The Applicant holds a valid Opinion; and
- (4) **The proposal is on lands with a zoning that accommodates or “facilitates” the proposed uses.**

We contend that if the stance is taken that the *Blessington Local Area Plan 2013–2019* has expired, then this may define the settlement and the subject site as ‘unzoned’ or ‘white lands’ in nature.

**Yet, we note that on such lands, Planning Applications are considered by the Planning Authority on their individual merits, on a case-by-case basis. This is common, standard practice and is how Wicklow County Council, other Councils and An Bord Pleanála assess proposals (as discussed below).**

Other than such Planning Applications being assessed against relevant policies, objectives and standards, we are unaware of any specific provision that would preclude a Planning Application coming forward on ‘white lands’. In fact, we note the following extract from Section 6.0 of the Development Plan, which clearly indicates that housing can be – and is – facilitated on ‘unzoned’ lands in County Wicklow:

*“This chapter in addition to the Core Strategy puts in place a framework to guide the delivery of new housing. The aim of this framework is to ensure...*

- *That in areas where new housing will be permitted, on unzoned lands (e.g. in villages and in the open countryside) the policies and objectives for such development are clearly articulated...”<sup>14</sup>*

Further still, we contend that as the proposed development is sited at an infill location in an established settlement<sup>15</sup>, it is a distinctly different proposition to the same scheme coming forward on ‘white lands’ in an isolated, edge of centre or rural area.

<sup>14</sup> The statement of “e.g. in villages and in the open countryside” only references these areas as ‘examples’, thus it **does not** preclude lands in towns and larger settlements.

<sup>15</sup> Elaborating upon this point, the site’s urban context means that rural housing policy and development standards should not apply (nor do they need to, as there is ample guidance for urban development in the overarching County Development Plan).



Drawing on the above points, whilst a Party might contend that the site is 'unzoned' due to the lack of an in force local plan, we firmly assert that the no zoning or 'white lands' designation is, in fact, a *de facto* zoning given it can facilitate a range of different uses. Furthermore, applications on such lands are still required to adhere to relevant policies and objectives. **Adding to this, we assert that the clear intention of the Act cannot be to rule-out the prospect of LRDs in urban areas simple because a Party considers the site to be 'unzoned' by way of a technicality – especially when a proposal adheres to key sequential, compact growth principles, and accords with relevant policies, objectives and design standards.** Rather, it clearly seeks to avoid LRDs on inappropriately zoned sites or in inappropriate contexts where the primary residential use would conflict with envisaged and existing land-uses. For example, it is clearly seeking to avoid LRDs coming forward on lands for 'heavy industry' or 'open space', where the zoning or pattern of development clearly would not be able to "*facilitate*" the uses "*proposed in the application*". This is a critical, fundamental clarification, in our opinion.

### 1.2.3 The Role of the "*Planning Authority*" and the Board's Role in Considering Planning Applications

**Notwithstanding the above insights, we would like to make a highly important point in relation to the Refusal Reasons provided by the Board in respect of the 2 No. Planning listed above.**

The Board placed weight on Section 32A(2)(b)(ii) of the *Planning and Development Act 2000* (as amended), which refers to the consideration of the Planning Application by the "*planning authority*". Section 2 of the Act defines a "*planning authority*" as meaning a "*local authority*". No reference is made to An Bord Pleanála; the 'Planning Authority' definition does not extend to include the Board.

Therefore, assuming the subject site is indeed considered to be 'unzoned' or to be not capable of facilitating the relevant LRD uses – contrary to the stance of WCC (i.e. the Planning Authority) – we contend that there is no mechanism in Section 32A of the Act for the Board to refuse to assess an Application on lands 'without a zoning', nor is there a legislative basis upon which the Board can Refuse Planning Permission for this reason. Rather, in our opinion, the issue of validity lies with the Planning Authority and the approach taken by the Board in their assessment of the Ardavan LRD (discussed below) is appropriate; setting it against the relevant policies and objectives and considering it on its individual merits.

### 1.2.4 Important Precedents in the Validation and Assessment of LRDs and Development on Perceived 'Unzoned' Lands

To elaborate upon the above points further we draw the Reader's to 4 No. precedent cases made by An Bord Pleanála:

#### **Ardavan Wexford LRD (Co. Wexford) – Reg. Ref. 20221690 (ABP Ref. 316019)**

This development principally proposed 222 No. dwellings on lands on the outskirts of Wexford Town, Co. Wexford. The Inspector contended in their assessment that the *Wexford Town and Environs Development Plan 2009–2015* had expired, and without zoning provided in the *Wexford County Development Plan 2022–2028*, they formed the following opinion that a zoning designation did not apply to the site. However, they formed the following highly relevant opinion:

*"...the fact that the appeal site is not zoned for residential, **does not necessarily make the proposed development unacceptable. As there is no applicable zoning on the site, the proposed residential use of the site does not conflict with zoning of the land,** and it is therefore a question of **assessing the proposed land use on the site in consideration of objectives under the current Development Plan** for the County." [emphasis added]*

Notwithstanding this, An Bord Pleanála proceeded to Refuse Planning Permission. Whilst Reason Nos. 2–5 related to design, social infrastructure and ecology, Reason No. 1 was tied to sequential and sustainable development. In short, the latter was informed by the Inspector's carefully considered assessment of the proposed uses and development in respect of (1) the site's location, (2) the Development Plan's core strategy and housing strategy and (3) the principles of sequential development and compact growth.

The Inspector and the Board concluded that the development's position on a site outside the town would be contrary to sequential development and compact growth, especially in light of the County Development Plan's significant reduction in land requirement for the settlement of Wexford. The Inspector remarked:

*"Taking a sequential approach, it is likely in my view that sites within the town itself, are likely to be prioritised for residential zoning in my view..."*

*I am not satisfied that a case has been made by the Applicant that the development of the appeal site for large scale housing development would represent spatially sequential growth of the town, as other more appropriate sites may exist for large-scale housing development and could represent a more sustainable approach...*

*...in my view the proposed development is contrary to National Strategic Outcome 1 'Compact Growth' under the NPF and Objective CS02 of the Wexford County Development Plan 2022-2028 concerning adherence to the principles set out in the Core Strategy, including the 'Development Approach' for Wexford Town, which includes point no.6 that the development of brownfield and infill sites in the town centre and close to public transport corridors will be prioritised."*

With respect to the procedure for applying for Planning Permission for an LRD on lands without a specified zoning, the Inspector acknowledged Section 32A(1)(b)(ii) of the *Planning and Development Act 2000* (as amended), as discussed above. They noted the question of validity, but concluded:

*"...would have been under the jurisdiction of Wexford's Planning Authority and is not an area that can be revisited as part of an appeal to An Bord Pleanála. Wexford County Council's Local Planning Authority accepted the application for large-scale residential development..."*

We note that the Board **did not** include this matter in their Reasons for Refusal.

**On this very point, we refer the Reader back to our previous point that in our opinion there is no mechanism in Section 32A of the Act for the Board to refuse to assess an Application on lands 'without a zoning', nor is there a legislative basis upon which the Board can refuse Planning Permission for this reason. This matter lies with the "planning authority". Rather, in our opinion the approach taken by the Board in their assessment of the Ardavan LRD is appropriate. This is despite the approach taken by the Board in respect of Reg. Ref. 23/60219 (ABP Ref. 319137) in Rathnew and Reg. Ref. 23/689 (ABP Ref. 319657), which were mentioned at the outset.**

Evidently, in our opinion, the Inspector and Board acknowledged that:

- (1) Residential uses do not conflict with the zoning (in an instance where there is no applicable zoning);
- (2) Where it is considered that a local plan containing zoning provisions is expired, the basis of assessment shifts to being against the objectives of the Development Plan; and
- (3) The Board is not precluded from assessing, nor are they obliged to refuse, Planning Applications for LRDs on lands that are deemed to be without a zoning designation.

#### **Newtown/Ardclough Road Section 177E Application Direct to An Bord Pleanála (Co. Kildare) – ABP Ref. 317767**

This Section 177E Planning Application, submitted directly to An Bord Pleanála, primarily sought Planning Permission for the construction of 39 No. residential dwellings. Although not an LRD, we deem this to be an appropriate precedent as it relates to a development on lands that the Board deemed were not subject to an extant Local Area Plan, thus could be deemed to be unzoned.

The Inspector did not address the matter in detail in their assessment of the development, but did refer remark that:

*"The site is within the area of Kildare County Council, with zoning designations and specific policies for housing set out in the Celbridge Local Area Plan 2017-2023 (**still the operative plan for the area**)."* [emphasis added]

This is despite the life of the *Celbridge Local Area Plan 2017-2023* having not been formally extended.

Adding to this, in proceeding to Grant Planning Permission for this development, the Board – in their 'Reasons and Conditions' – considered:

*"(e) the Celbridge Local Area Plan 2017–2024, **which has not been updated**"* [emphasis added]

Clearly, the Inspector and Board acknowledge that the Celbridge Plan remained applicable, in the same vein as WCC deems the Blessington Local Area Plan 2013–2019 to remain "applicable", or as the Board states: "operative".

#### **Cornamaddy, Athlone (Co. Westmeath) – Reg. Ref. 2360374 (ABP Ref. 319902)**

This Planning Application related to an LRD application for 177 No. residential units in Athlone, which was Granted Permission by An Bord Pleanála on 23<sup>rd</sup> September 2024.

A Third Party in their Appeal had raised a concern that the Athlone Town Development Plan had a stated life of 2014-2020 and that the site is thus no longer zoned.

The Inspector in considering the validity of the Plan in the Athlone case stated:

*"I note that the ATDP was originally prepared for the 2014-2020 period. It covered the whole of the functional area of Athlone Town Council and part of the functional area of Westmeath County Council. However, while Athlone Town Council was dissolved in 2014, Section 11C(a) of the Planning and Development Act of 2000 (as amended) outlines that the development plan for such dissolved areas 'shall continue to have effect to the extent provided for by that plan and be read together with the development plan for the administrative area within which the dissolved administrative area is situated'."*

The Inspector further stated that:

***"I note that the Westmeath CDP 2021-2027 was subsequently adopted and that it does not set out zoning objectives for Athlone. The planning authority currently determines planning consents according to the zoning objectives set out in the Athlone Town Development Plan 2014 – 2020, as was the case in the current appeal. In this regard, the WCC Planner's Report refers to the provisions of section 11C(a) of the Act and contends that the ATDP continues to have effect as there are no specific provisions either fixing a definitive life span for a development plan nor expressly providing for its expiration. The report states that the legislation does not provide for the extinguishment of a development plan in the absence of a replacement plan." [emphasis added]***

The Inspector concluded this element of their assessment by stating that the site is still zoned for residential and other uses.

The Board in their Order to Grant Permission referred to ***"the zoning objectives for the lands for residential and other ancillary uses as per the Athlone Town Development Plan 2014-2020, which remains applicable,..." [emphasis added]***

#### **Loreto School, Bray (Co. Wicklow) – Reg. Ref. 2360266 (ABP Ref. 319418)**

This Planning Application related to the redevelopment of the existing Loreto School in Bray, Co. Wicklow.

With respect to the relevant or applicable statutory plan pertaining to the site, we note that the Inspector remarked the following:

***"The Bray Municipal District Local Area Plan 2018 - 2024 was effective at the time of decision by the PA on this application (6 March 2024), however it has since expired. I note that the statutory process in the review of the LAP has not yet commenced. The Wicklow County Development Plan 2022-2028 (CDP) which came into effect 23 October 2022 is the operative Development Plan for the county in its entirety, including Bray. It is therefore the relevant plan in the assessment of this case." [emphasis added]***

In proceeding to Grant Planning Permission for this development, the Board – in their 'Reasons and Conditions' – considered *"the provisions of Wicklow County Development Plan"* and made no reference to the *Bray Municipal District Local Area Plan 2018–2024*.

Therefore, as in the case of the Ardavan LRD, the conclusion was that the relevant local plan was not 'in force' and that the Planning Application would be assessed in the context of the County Development Plan.

### 1.2.5 Concluding Remarks on the Local Area Plan's Status and the Validity of Planning Applications

As has been demonstrated above, there have been varying positions taken by An Bord Pleanála in respect of the life of local plans and the validity of considering LRD Planning Applications.

However, we wish to stress the position taken by Wicklow County Council that the *Blessington Local Area Plan 2013–2019* remains an "...applicable Plan relating to the subject site, in addition to the County Development Plan 2022."<sup>16</sup> Consequently, we contend that the Plan's zoning remain in force and that there is no barrier to proceeding with the lodgement of this LRD Planning Application. This principle of this is supported by the Board's own assessment of ABP Ref. 317767 in Co. Kildare, wherein they accepted that the *Celbridge Local Area Plan 2017–2024* as being the "operative plan for the area" despite not having been extended/updated.

Notwithstanding this, if the Council, An Bord Pleanála or a Third-Party takes the position that the *Blessington Local Area Plan 2013–2019* has indeed expired and that its land-use zoning designations no longer apply, we have presented a robust, alternative case to allow for the lodgement, validation and positive assessment of this LRD Planning Application. Specifically, we note:

- The 'white lands' or 'unzoned' status does not preclude development and as highlighted above, Planning Applications on such lands are assessed on a case-by-case basis, based on their individual merits. Refer to the An Bord Pleanála assessment of the Ardavan LRD in this respect.
- The 'white lands' or 'unzoned' status can "facilitate" a range of uses, including those proposed as part of this LRD, as highlighted by the content of the *Wicklow County Development Plan 2022–2028* and An Bord Pleanála's assessments of the Ardavan LRD and Loreto School in Bray.
- The matter of an LRD site not having a formal zoning designation is not for consideration by An Bord Pleanála or a reason for An Bord Pleanála Refusing Planning Permission, in our opinion, as clarified above in the context of Section 32A(2)(b)(ii) of the *Planning and Development Act 2000* (as amended).

### 1.3 Summary of the Proposed Development

In summary, the proposal principally comprises the construction of a mixed-use development with a gross floor area of 23,219.1 square metres and ranging in height from 1 No. to 5 No. storeys that includes: a total of 269 No. residential dwellings (36 No. 1-bed, 127 No. 2-bed, 94 No. 3-bed and 12 No. 4-bed) as houses and apartments/duplexes, with 233 No. of these as 'standard' units and 36 No. as 'later living' units; a medical centre (224 sq m); a pharmacy (115 sq m); and a café (60 sq m).

Other key aspects include multi-modal and cycle/pedestrian entrances, roundabout upgrades and cycle/pedestrian crossings points, hard and soft landscaping, car and cycle parking, and 3 No. sub-stations.

Further development details are provided in Section 5 below.

---

<sup>16</sup> WCC's response to a query from An Bord Pleanála regarding the status of the *Blessington Local Area Plan 2013–2019* in respect of Reg. Ref. 23/689 (ABP Ref. 319657).

#### 1.4 Previous Consultation with Wicklow County Council

As required under legislation, this Planning Application has been preceded by a Section 247 Pre-Planning Consultation (PPC) meeting (8<sup>th</sup> March 2024) and a Section 32C LRD Meeting (20<sup>th</sup> June 2024); both held between the Design Team and representatives of WCC.

The Section 32D LRD Opinion is dated 15<sup>th</sup> July 2024, and this Planning Application is lodged within 6 No. months of that date.

#### 1.5 Purpose and Structure of this Report

The purpose of this *Planning Report and Statement of Consistency* is to introduce the subject site and proposed development, with the intention being to demonstrate how the scheme accords with the principles of proper planning and sustainable development.

The Report continues with the following structure:

**Section 2** – Site Location, Description, Context and Accessibility

**Section 3** – Planning History

**Section 4** – Previous Consultation with Wicklow County Council

**Section 5** – Development Description

**Section 6** – Statement of Consistency

**Section 7** – Planning Policy Context and Assessment

**Section 8** – Planning Administration

**Section 9** – Conclusion



## 2.0 SITE LOCATION, DESCRIPTION, CONTEXT AND ACCESSIBILITY

### 2.1 Site Location and Description

The subject site, which measures approximately 6.05 Ha, is located to the immediate north/west of the established town centre of Blessington. It is a greenfield site, with undulations and a topography that generally drops from the north-east corner to the south-west corner.

As shown in Figure 2.1, it is generally bound as follows: to the north-east by the Oak Drive residential development and undeveloped lands; to the south-east by the grounds of St Mary's Senior National School, Cocoon Childcare and the mixed-use development of Newtown Enterprise Centre and Dunnes Stores (across a local street); to the south-west by the Downshire Park residential development (across a local street); and to the north-west by undeveloped land, but the future town park (across the Blessington Relief Road).



Figure 2.1: Site location map with the indicative boundary of the subject site outlined in red

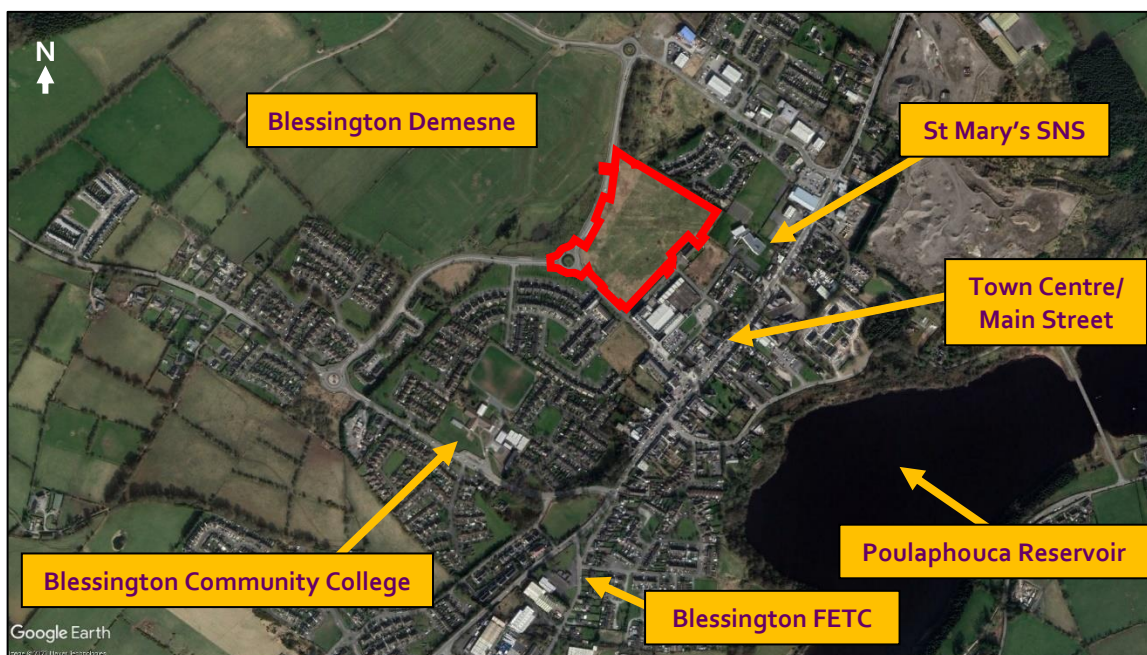
Source: Google Earth (March 2022), annotated Thornton O'Connor Town Planning (2024)

### 2.2 Site Context

The site is centrally located within the town, as shown on Figure 2.2, which includes a selection of local amenities and contextual features. The location of the site immediately abutting the town centre means that it is proximate to a host of services, facilities and amenities, including:

- Primary and secondary schools;
- Further education centres;
- Childcare;
- Shops;
- Personal services (e.g. hairdresser);

- Professional services (e.g. solicitor);
- Employment opportunities (e.g. within the town centre and Blessington Industrial Estate); and
- Poulaphouca Reservoir and Blessington Greenway Trail.



**Figure 2.2:** Context of the subject site within the Blessington settlement

**Source:** Google Earth (March 2022), annotated by Thornton O'Connor Town Planning (2024)

## 2.3 Site Accessibility

### 2.3.1 Active Modes

The centrality of the site makes it a sustainable location at which to deliver much-needed housing. Residents will be able to reach many of the key services, facilities and amenities that they will require on a day-to-day basis via active modes. This is demonstrated by the walking and cycle times compiled in Table 2.1 below.

| Service, Facility or Amenity  | Category            | Walk Time  | Cycle Time |
|-------------------------------|---------------------|------------|------------|
| Dunnes Stores                 | Shopping            | 3 minutes  | 1 minute   |
| Cocoon Childcare              | Childcare           | 5 minutes  | 1 minute   |
| McGreal's                     | Pharmacy            | 6 minutes  | 3 minutes  |
| AIB                           | Bank                | 6 minutes  | 3 minutes  |
| St Mary's NS                  | Primary School      | 7 minutes  | 3 minutes  |
| Kilbride Road Surgery         | Healthcare/Medical  | 7 minutes  | 3 minutes  |
| Blessington Dental            | Healthcare/Dental   | 7 minutes  | 3 minutes  |
| Blessington Post Office       | Post Office         | 8 minutes  | 3 minutes  |
| Blessington Community College | Post-Primary School | 13 minutes | 3 minutes  |

**Table 2.1:** Key services, facilities and amenities proximate to the subject site and reasonably accessible via active modes of transport

**Source:** Google Maps (2023), collated by Thornton O'Connor Town Planning (2023)



### 2.3.2 Public Transport

Blessington is served by several bus routes, operated by Dublin Bus, Bus Éireann and Local Link. They connect the town with other locations in Wicklow, as well as those in Dublin, Wexford and Kildare. Routes include:

- Route No. 65 (and 65A) – Blessington to Poolbeg Street (Dublin City)
- Route No. 132 – Bunclody/Rosslare/Tullow to Dublin City Centre
- Route No. 183 – Arklow to Sallins
- Route No. 885 – Baltinglass to Sallins
- Route No. 863 – Blessington to Pearse Station (Dublin City)

The routes serve a series of bus stops present along the length of Main Street, all within walking distance of the subject site.

### 3.0 PLANNING HISTORY

#### 3.1 Planning History of the Subject Site

A review of the subject site's planning history reveals 2 No. Planning Applications of note, which are detailed below.

##### 3.1.1 Reg. Ref. 20362 – Residential Development

|                                   |   |
|-----------------------------------|---|
| <b>WCC Reg. Ref.</b>              | <b>20362</b>  |
| <b>Applicant</b>                  | Glenveagh Homes Limited   |
| <b>Address</b>                    | "Blessington Demesne, Blessington, Co. Wicklow"   |
| <b>Description of Development</b> | "Development at a site (c.3.43 hectares) at Blessington Demesne, Blessington, Co. Wicklow bounded generally by Oak Drive and Blessington Inner Relief Road to the north and east, and Cocoon Crèche to the south, and Glenveagh Homes Ltd., Phase 1 lands (under Planning reg. ref. 20/184 for a proposed 120 bedroom Nursing Home and 77 no. dwellings) to the west. The proposal is for the second phase of development on the overall Glenveagh lands and will consist of: A) The construction of 96 no. dwellings providing 39 no. 2 storey 2 bedroom houses [House Types E1, G], 54 no. 2 storey 3 bedroom houses [House Types C, D, F], along with 3 no. 2 bedroom duplex/apartments in a 3 storey block (Block G) all apartment units to have balcony or terrace; B) Hard and soft landscaping (including public lighting) and open space (boundary treatment); communal open space for duplex apartments; well as regrading/re-profiling of site where required [including import and export of soil, if required] as well as bicycle/bin stores and 178 no. car parking spaces; C) Vehicular access from the west (from Blessington Inner Relief Road [BIRR]) and south west along link road between the BIRR and Main Street, with provision for pedestrian connection to Oak Park to the east; D) Surface water attenuation measures (including underground attenuation systems) as well as connection to water supply, drainage; E) All ancillary site development/construction works." |
| <b>Decision Date</b>              | 9 <sup>th</sup> October 2020  |
| <b>Decision</b>                   | Grant   |
| <b>Final Grant Date</b>           | 13 <sup>th</sup> November 2020  |

On 14<sup>th</sup> April 2020, Glenveagh Homes Limited sought Planning Permission for what would be the second phase of development at the subject site. The proposal included 96 No. dwellings, including both houses and duplexes/apartments. The Site Layout Plan for the permitted development is shown in Figure 3.1 below.



Figure 3.1: Site Layout Plan for Permitted Phase 2 development at the subject site

Source: Tyler Owens Architects (2020)

The *Planner's Report's* assessment concluded that:

*"Having regard to the previous permission for development on site, the design and layout of the proposed development and the zoning objectives for the area, in principal [sic], the proposal is considered acceptable and would accord with the zoning objectives for the area. Issues identified in the report should be addressed by way of further information."*

A Request for Further Information (RFI) was issued on 3<sup>rd</sup> July 2020 in relation to 8 No. items, which principally related to traffic/transport/parking matters, public open space design and connectivity, surface and foul water design, and archaeology. A response was submitted on 21<sup>st</sup> August 2020, and whilst the submittals were generally accepted by the Council, a Request for a Clarification of Further Information (RCFI) was issued on 11<sup>th</sup> September 2020 in relation to road design and safety.

Following the submission of a response to the RCFI on 15<sup>th</sup> September 2020, the Council proceeded to Grant Planning Permission subject to 21 No. conditions on 9<sup>th</sup> October 2020. It was

not subject to First-Party or Third-Party Appeals and a Final Grant was issued on 13<sup>th</sup> November 2020.

### 3.1.2 Reg. Ref. 20184 – Nursing Home and Residential Development

|                                   |   |
|-----------------------------------|---|
| <b>WCC Reg. Ref.</b>              | <b>20184</b>  |
| <b>Applicant</b>                  | Glenveagh Homes Limited   |
| <b>Address</b>                    | Blessington Demesne, Blessington, Co. Wicklow   |
| <b>Description of Development</b> | <i>"Nursing care home and residential development comprising (a) nursing care home (4 no storeys of 120 no bedspaces (c7428 sqm) along with 60 no car parking spaces (at undercroft and basement level c2477 sqm), open space and all associated residential care facilities (b) construction of 77 no dwellings comprising 29 no 2 storey houses (10 no 2 bedroom houses (house type E) and 19 no 3 bedroom houses (house types C, D &amp; F), and 48 no apartments / duplex apartments as follows: Block A &amp; D, 3 storeys comprising 30 no apartments (15 no 2 bedroom apartments in each building), blocks B &amp; C, 3 storeys comprising 12 no apartments (2 no 2 bedroom apartments and 4 no 3 bedroom apartments in each building), blocks E &amp; F, 3 storeys comprising 6 apartments (3 no 2 bedroom apartments in each building), all apartment units to have balcony or terrace, (c) hard and soft landscaping (including public lighting) and open space (boundary treatment), communal open space for duplex apartments, regarding / reprofiling of site where required along with bicycle / bin stores and 100 no car parking spaces for dwellings (d) vehicular access from the west (from Blessington Inner Relief Road (BIRR) and south west along link road between the BIRR and Main Street with pedestrian accesses as well as works to roundabout and provision of road crossings (e) surface water attenuation measures and underground attenuation systems as well as connection to water supply, drainage, (f) all ancillary site development / construction works."</i> |
| <b>WCC Decision Date</b>          | 8 <sup>th</sup> October 2020  |
| <b>WCC Decision</b>               | Grant   |
| <b>ABP Ref.</b>                   | 308578  |
| <b>ABP Decision Date</b>          | 27 <sup>th</sup> January 2022   |
| <b>ABP Decision</b>               | Grant   |

On 25<sup>th</sup> February 2020, Glenveagh Homes Limited sought Planning Permission for the first phase of planned development at the subject site. The proposal included 77 No. dwellings (including both houses and duplexes/apartments) and a 120-bedroom nursing home. Additionally, works were proposed to upgrade the roundabout to the west and to provide pedestrian road crossings at the BIRR. The Site Layout Plan for the permitted development is shown in Figure 3.2 below.



**Source:** Tyler Owens Architects (2020)

*"Having regard to the previous permission for development on site, the design and layout of the proposed development and the zoning objectives for the area, in principal [sic], the proposal is considered acceptable and would accord with the zoning objectives for the area. Issues identified in the report should be addressed by way of further information."*

Following the submission of a response to the RCFI on 15<sup>th</sup> September 2020, the Council proceeded to Grant Planning Permission subject to 21 No. conditions on 8<sup>th</sup> October 2020. The decision was subject to a Third-Party Appeal to An Bord Pleanála by 'Downshire Lodge Nursing Home Limited and Downshire Place Independent Living Limited', who raised concerns in relation to overprovision of nursing homes in Blessington. The Planning Inspector was of the opinion that *"the appeal [should] be dismissed"* given the lack of information provided by the Appellant to make their claims and the appropriateness of the site location and zoning for nursing home use.

The Board proceeded to assess the scheme and ultimately upheld WCC's decision. An Bord Pleanála Granted Planning Permission on 27<sup>th</sup> January 2022.

### 3.2 Importance of the Site's Planning History

The 2 No. recent Planning Applications at the subject site are evidence of WCC's acceptance of residential development at the site, as well as the provision of **bespoke institutional housing**, which under Reg. Reg. 20184 was in the form of a nursing home. Given residential uses, as well as LLUs, are proposed as the main parts of this revised proposal, there is an established precedent to provide support for same. The broadening of the use mix proposed as part of this Application will result in the delivery of complementary and synergistic uses, proximate to the core of the town centre, closer to Main Street.

The height of the proposed nursing home in the southern town centre zoned portion of the site is notable. This allowed for a positive transition in height from the 5-storey Newtown Enterprise Centre and Dunnes Stores development to the south-east. It also provides evidence of the Council's support for a taller structure on-site, which carried through to the pre-planning consultation stages of this new development.

Additionally, the 2 No. Planning Applications are of relevance in the context of the Development Plan's own recent adoption and the detail of its Core Strategy, noting that the Council has subsequently shown signs of supporting additional residential development. On this matter, we direct to the Council to Section 7.2 below.

## 4.0 PREVIOUS CONSULTATION WITH WICKLOW COUNTY COUNCIL

As required by legislation, a Section 247 PPC and Section 32C LRD Meeting were held between representatives of WCC and the Design Team. The details of these meetings are provided below.

### 4.1 Section 247 PPC

The meeting was held online via Microsoft Teams on 8<sup>th</sup> March 2024. The attendees are listed below.

#### WCC Attendees:

- Suzanne White (SW) – Planning Department
- Fergal Keogh (FK) – Planning Department
- Mark Costello (MC) – Water Services Department
- Marc Devereux (MD) – Water Services Department
- John Bowes (JB) – Roads Department
- Declan O'Brien (DOB) – Roads Department
- Pat Byrne (PB) – Roads Department
- Nicola Fleming (NF) – Staff Officer

#### Design Team Attendees:

- Justin Farrelly (JF) – Marshall Yards Development Company Ltd
- Sadhbh O'Connor (SOC) – Thornton O'Connor Town Planning
- Daniel Moody (DM) – Thornton O'Connor Town Planning
- Eamonn Gahan (EG) – Deady Gahan Architects
- Liam Murphy (LM) – Deady Gahan Architects
- Brendan Manning (BM) – DBFL Consulting Engineers
- Aimee Dunne (AD) – DBFL Consulting Engineers
- Ilsa Rutgers (IR) – Ilsa Rutgers Landscape Architecture

#### 4.1.1 Matters Raised and Design Team Summary Responses

The matters discussed during the PPC meeting were wide-ranging, benefitting from input from the various Council Departments and Design Team disciplines. For brevity, we have summarised the principal matters raised during the PPC that we deem required an 'action' and provided a summary response to each in the Table 4.1 below.

| General Topic | Matter Raised  | Summary Response  |
|---------------|--|---|
| Land-use      | WCC questioned the appropriateness of the LLUs on the town centre zoned portion of the site. | <p>The Design Team firmly contend that although the LLUs are 'residential' in nature, they are a unique and distinct residential typology. Given they will cater to the needs and preferences of an older demographic, they serve a social/community role by broadening the range of available housing stock and allowing residents to remain living locally, even as they age.</p> <p>Notwithstanding this, the Design Team has broadened the mix of uses proposed on the town</p> |

| General Topic             | Matter Raised  | Summary Response   |
|---------------------------|--|--|
|                           |  | <p>centre zoned portion of the site by introducing a commercial/café unit of 215.8 sqm at ground floor level. This will not only add to the variety of uses proposed, but to the resulting vibrancy and vitality sought for town centre lands. Additionally, the new south-facing plaza area will activate and enliven this part of the site.</p> <p>Furthermore, we draw the Council's attention to the Design Team's change to the built-form in this part of the site. The scheme now includes a 4-storey mixed-use block (LLUs and the commercial/café unit). This gives it greater assertive presence and a more coherent relationship with the up to 5-storey Newtown Enterprise Centre and Dunnes Stores development to the south-east and 3-storey residential units to the south-west.</p> <p>For further details, please refer to Section 7.1 below.</p> |
| <b>Core Strategy</b>      | <p>WCC noted the Core Strategy limits and that they would likely be exceeded. WCC also noted that in relation to Core Strategy flexibility, they CSO's 'Built-up Area' to define what was an "infill" site. WCC added that the Applicant should set out the justification for the Council, even if they are not of the opinion that the development materially contravenes the Development Plan.</p> | <p>In response to this matter, we direct the Council to the expanded detail provided in Section 7.2 below.</p>   |
| <b>Density and Height</b> | <p>WCC requested that the density (which was at approx. 43 uph) be increased due to the site's location, zoning, servicing, etc.</p>   | <p>The Design Team has reflected upon this and increased the density to 49.2 dph, or 49.6 dph using the Compact Growth Guidelines' prescriptive methodology.</p> <p>Further detail is provided in Section 7.4 below, including how density is distributed across the site and its zonings.</p>   |
|                           | <p>WCC requested that additional height and built presence be considered,</p>  | <p>The Design Team has responded by proposing 3-storey duplex units along the south-western and north-western frontages so as to deliver a strong built-edge to the site. Additionally, a 4-storey</p>   |



| General Topic                            | Matter Raised   | Summary Response  |
|--|---|---|
|  | especially along the western site extent fronting the roundabout and Blessington Inner Relief Road and on the town centre zoned lands to the south.   | mixed-use block (containing LLUs and the commercial/café unit) is now proposed on the southernmost portion of the site on the town centre zoned lands, creating a better relationship with opposing buildings.  |
| <b>Dwelling Mix</b>                      | Dwelling mix was noted as being acceptable, but WCC noted that they had a preference for more 1-bed units if possible.  | The Design Team considered 1-bed unit provision as part of a wider series of changes to the development. The total number increased from 32 No. to 33 No., but given the broader tweaks, their relative provision fell slightly (but immaterially) to 12.5%. We contend that the unit mix remains appropriate, and both feasible and viable to deliver.                     |
| <b>Roads and Transportation</b>          | It was requested that <i>Traffic and Transport Assessment</i> be prepared.  | This has been prepared by DBFL and is available for review under separate cover.  |
| <b>Roads and Transportation</b>          | Several linear stretches of road were noted.  | These have been managed by way of minor deflections and insets, as well as raised tables / crossing points.   |
| <b>Roads and Transportation</b>          | Homezones require further consideration.  | The location and extent of homezones were subject to detailed review and consideration by DBFL and the wider Design Team. Their current provision and design is now considered to be appropriate and will act to prioritise safe and easy movement.   |
| <b>Flood Risk</b>                        | A <i>Site Specific Flood Risk Assessment</i> should be prepared and potential consideration given to the preparation of the Justification Test due to a small area of Flood Zone A/B in the very north. | DBFL have prepared a <i>Site Specific Flood Risk Assessment</i> which is available for review under separate cover.<br><br>We note that this report confirms: " <i>The small section of the site in the northern corner which overlaps with Flood zone A is not proposed for development and will remain open space and therefore, no justification test is required.</i> " |
| <b>SuDS and Surface Water Management</b> | It was requested that greater consideration be given to nature-based surface water management solutions.  | A dual use of more 'traditional' and nature-based SuDS measure has been utilised in the development due to site constraints and the need to comply with key development management criteria.<br><br>We refer the Council to DBFL's enclosed <i>Infrastructure Design Report</i> and supporting drawings which provide a detailed rationale and overall design approach.     |
| <b>Watercourse</b>                       | Development should respect the riparian buffer and Inland Fisheries Ireland and   | The location of proposed buildings has been pulled away (south) from the small stretch of watercourse that traverses the site, which we note is already   |

| General Topic         | Matter Raised   | Summary Response  |
|-----------------------|---|---|
|                       | Development Plan guidance.  | <p>culverted by the overpass of the Blessington Inner Relief Road.</p> <p>The Development Plan states that a 25 metre buffer should "<i>generally</i>" be provided and that flexibility can be provided by the Council (CPOs 13.3 and 17.26).</p> <p>The riparian buffer has been respected with development thereat limited. The nearest building is 19 metres from the watercourse, with the intervention closer to that including footpaths and (importantly) additional SuDS and vegetation. Whilst the foregoing are within the 25 metres generally south, we are of the opinion that a dispensation is appropriate in this case due to:</p> <ol style="list-style-type: none"> <li>1. The short stretch of the watercourse through the site;</li> <li>2. The watercourses culverted configuration to the west;</li> <li>3. The lack of evidence in the EcIA that the watercourse is used by protected species; and</li> <li>4. The need to achieve an appropriate scale and density of development on-site, whilst complying with various other development management criteria.</li> </ol> |
| Archaeology           | It was requested that an <i>Archaeological Impact Assessment</i> be prepared.               | This has been prepared by IAC and is available for review under separate cover.   |
| Social Infrastructure | It was requested that a <i>Social Infrastructure Audit</i> be prepared.                     | This has been prepared by Thornton O'Connor Town Planning and is available for review under separate cover.   |
| Part V                | It was recommended that the Applicant engage with the Housing Department at an early stage. | The Applicant has commenced provisional engagement with the Housing Department and is working towards agreeing an appropriate Part V allocation. The current proposal is set out in the materials prepared by DGA and in Section 7.13 below. Please also refer to the <i>Part V Proposal</i> booklet.   |

**Table 4.1: Matters raised during the PPC and responses to same**

**Source:** Compiled by Thornton O'Connor Town Planning (2024)

## 4.2 Section 32C LRD Meeting

The LRD Meeting was held online via Microsoft Teams on 20<sup>th</sup> June 2024. The attendees are listed below.

### WCC Attendees:

- Suzanne White (SW) – Planning Department
- Fergal Keogh (FK) – Planning Department
- Declan O’Brien (DOB) – Roads Department
- Pat Byrne (PB) – Roads Department
- Carol Murphy (CM) – Staff Officer

### Design Team Attendees:

- Justin Farrelly (JF) – Marshall Yards Development Company Ltd
- Colm McElDowney (CME) – Marshall Yards Development Company Ltd
- Sadhbh O’Connor (SOC) – Thornton O’Connor Town Planning
- Daniel Moody (DM) – Thornton O’Connor Town Planning
- Eamonn Gahan (EG) – Deady Gahan Architects
- Liam Murphy (LM) – Deady Gahan Architects
- Brendan Manning (BM) – DBFL Consulting Engineers
- Aimee Dunne (AD) – DBFL Consulting Engineers
- Ilsa Rutgers (IR) – Ilsa Rutgers Landscape Architecture
- Padraic Fogarty (PF) – Openfield
- Bernadette O’Connell – JBA Consulting
- Ian Byrne – Byrne Environmental
- Faith Bailey – IAC

### 4.2.1 LRD Meeting and Opinion and Response to Matters Raised

Given the subsequent issuance of the LRD Opinion and the need to prepare a statement of response to same, we respectfully direct the Council to the separately enclosed *Statement of Response to LRD Opinion*. This report details the key matters raised during the LRD Meeting and in the LRD Opinion, and provides detail to address them in a clear and robust manner.

## 5.0 DEVELOPMENT DESCRIPTION

### 5.1 Key Site and Development Statistics

Key site and development statistics are set out in Table 5.1 below.

|  |                       |
|--|-----------------------|
| <b>Gross Site Area</b>   | 6.05 Ha               |
| <b>Net Developable Site Area</b>   | 5.35 Ha               |
| <b>Total Proposed Gross Floor Area</b>   | 23,219.1 sq m         |
| <b>Residential Gross Floor Area</b>  | 22,820.1 sq m (98.3%) |
| <b>Commercial/Café Unit Gross Floor Area</b>   | 399 sq m (1.7%)       |
| <b>Site Coverage (Based on Net Developable Area)</b>                                     | 23.7%                 |
| <b>Plot Ratio (Based on Net Developable Area)</b>  | 0.43                  |
| <b>Residential Density (Gross, Using Net Site Developable Area)</b>                      | 50.3 dph              |
| <b>Residential Density (Compact Growth Methodology, Using Net Site Developable Area)</b> | 51.2 dph              |
| <b>Building Height</b>   | 1–5 No. storeys       |
| <b>Public Open Space</b>   | 15%                   |

**Table 5.1: Key site and development statistics**

**Source:** Deady Gahan Architects (2024) and Thornton O'Connor Town Planning (2024)

### 5.2 Description of Proposed Development

The proposed development principally comprises the construction of a mixed-use development with a gross floor area of 23,219.1 square metres and ranging in height from 1 No. to 5 No. storeys (Figure 5.1) that includes:

- A total of 269 No. residential dwellings (36 No. 1-bed, 127 No. 2-bed, 94 No. 3-bed and 12 No. 4-bed), which are proposed as follows:
  - 233 No. 'standard' residential dwellings (24 No. 1-bed, 103 No. 2-bed, 94 No. 3-bed and 12 No. 4-bed), of which 185 No. are houses (103 No. 2-bed, 70 No. 3-bed and 12 No. 4-bed) and 48 No. are apartments/duplexes (24 No. 1-bed and 24 No. 3-bed); and
  - 36 No. 'later living' dwellings (12 No. 1-bed and 24 No. 2-bed), of which 12 No. are houses (all 2-bed) (Figure 5.2) and 24 No. are apartments (12 No. 1-bed and 12 No. 2-bed).
- a medical centre (224 sq m).
- a pharmacy (115 sq m).
- a café (60 sq m).



**Figure 5.1:** View of the 5-storey mixed-use block relating to the existing 5-storey mixed-use building to the south-east of the site

**Source:** 3D Design Bureau (2024)



**Figure 5.2:** View into the hybrid open space serving the later living houses

**Source:** 3D Design Bureau (2024)

The development also comprises:

- 2 No. Multi-modal entrances/exits with junctions at Blessington Inner Relief Road to the north-west and the local street to the south-west;
- A new pedestrian/cycle crossing to the south-east at the local street (Figure 5.3);



- Upgrades to the Blessington Inner Relief Road roundabout to the west, including pedestrian/cycle crossings (Figure 5.4);
- New pedestrian/cycle crossing at Blessington Inner Relief Road to the north-west;
- 341 No. Car parking space;
- Cycle parking;
- Hard and soft landscaping including public open space, communal amenity space and private amenity space (as gardens, balconies and terraces facing all directions);
- Boundary treatments;
- 3 No. Sub-stations;
- Bin stores;
- Public lighting;
- PV arrays atop all dwellings;
- PV array, lift overrun and plant atop the 5-storey mixed-use building; and
- All associated works above and below ground.



**Figure 5.3:** View of the proposed pedestrian and cyclist crossing at the east side of the site

**Source:** 3D Design Bureau (2024)

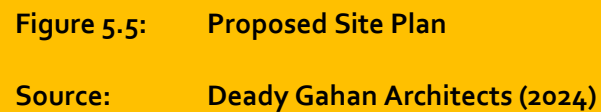


**Figure 5.4:** View of the proposed pedestrian and cyclist crossing at the east side of the roundabout at the Blessington Inner Relief Road

**Source:** 3D Design Bureau (2024)

For reference, an extract from the enclosed *Proposed Site Plan* prepared by Deady Gahan Architects is included below (Figure 5.5).







### 5.3 Understanding the Design Concept

We draw from the *Architectural Design Statement* prepared by DGA to provide background to the rationale and design approach for the proposed development:

*"The proposed development has been designed to provide high quality housing units that will contribute positively to Blessington and deliver much needed housing to the town.*

*The proposed site layout focuses on the creation of distinctive streetscapes with different widths and parking formations that helps generate a highly efficient scheme and assists our vision of placemaking.*

*To ensure the visual integration of the proposed development into the existing context, the scheme promotes the protection and enhancement of areas of high biodiversity value, including existing hedgerows and trees along the site's northern boundary.*

*The proposed scheme has been carefully considered and the layout has been organised into specific areas that are defined by building form and material changes. Double fronted, feature corner units have been used throughout the site and are strategically placed to create node points within the scheme and provide orientation cues for logical wayfinding."*

### 5.4 Description of Landscape Proposal

In respect of the landscape proposal, we defer to the *Landscape Design Statement* prepared by Ilsa Rutgers Landscape Architecture, which states:

*"The public open space is well distributed across the site and is centrally located to form a series of 'village greens' around which the houses are organised. In all cases, the proposed housing units are orientated to address the public open spaces, to ensure that the proposed parks are well overlooked.*

*Pedestrian and cycle paths are directed through the new public open spaces to create safe and attractive alternatives to short-distance car use and provide opportunities for exercise and social engagement with other residents.*

*The public open space will contribute to the proposed character areas and develop unique qualities that will add variety to the development and provide amenities for all ages."*

## 6.0 STATEMENT OF CONSISTENCY

The following Section comprises the statement of consistency of the proposed development with strategic national and regional planning policy, as well as with the relevant policies and objectives of the *Wicklow County Development Plan 2022–2028*. However, please note that the more detailed planning assessment is contained in Section 7.0 below.

### 6.1 *Project Ireland 2040: National Planning Framework*

*Project Ireland 2040: National Planning Framework* (NPF) is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country. The NPF is a long-term Framework that sets out how Ireland can move away from the current 'business as usual' pattern of development.

As set out in Section 6.6 of the NPF, core principles to "*allow for choice in housing location, type, tenure and accommodation in responding to need*" and to "*tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.*"

In light of same, it is contended that the provision of 269 No. high-quality residential units, comprising a mix of 1-, 2-, 3- and 4-bedroom dwellings at the subject site will contribute to achieving these core principles of the NPF.

In terms of housing supply, the NPF calculates that:

*"Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, **with increasing demand to cater for one and two-person households.**" [emphasis added]*

However, the *Draft First Revision to the National Planning Framework* published for comment earlier this year proposes a marked uplift on this figure to 50,000 No. dwellings, although this excludes existing pent-up demand, which indicates an even greater level of supply is required.

Pragmatically, the NPF recognised that "*...achieving this level of supply will require increased housing output into the 2020s to deal with a deficit that has built up since 2010.*"

The NPF highlights in Section 6.6 that 7 No. out of 10 No. households in the State consist of three people or less, with evidence of smaller household sizes necessitating more dwellings.

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the principles set out throughout this Section, as it provides a variety of dwelling sizes and typologies to meet the need for additional housing.

Section 2.2 of the NPF sets out an overview of the Strategy which includes reference to 'Compact Growth' as follows:

- *"Targeting a greater proportion (40%) of future housing development to be **within and close to the existing 'footprint' of built-up areas.***
- ***Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with***

***higher housing and jobs densities, better serviced by existing facilities and public transport.” [emphasis added]***

The NPF expressly seeks the densification of infill sites close to existing public transport and services and facilities such as at the subject site. National Policy Objective 35 states that it is an objective to:

*“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”*

The NPF also sets out the following regarding future growth needs in Section 6.6:

***“Increased residential densities are required in our urban areas... to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.” [emphasis added]***

The NPF recognises that building inwards and upwards is important to effectively address the housing crisis in a more environmentally efficient and sustainable way. Therefore, it is contended that there is a significant importance placed in the NPF on developing high-quality accommodation by increasing the density of developments.

Therefore, the NPF supports the delivery of the proposed development through increased density and height at the subject site, having regard to the design of the development which considers existing residential amenity, its proximity to public transport and local amenities, retail and commercial services and facilities.

Section 10.3 of the NPF identifies a list of 10 No. National Strategic Outcomes (NSOs), which define its vision. They are as follows:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. Sustainable Mobility;
5. A strong Economy supported by Enterprise, Innovation and Skills;
6. High Quality International Connectivity;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Water, Waste and other Environmental Resources; and
10. Access to Quality Childcare, Education and Health Services.

A series of key National Policy Objectives (NPOs) are also defined by the NPF and are the more detailed means through which the NSOs will be achieved. NPO 74 sets this:

*“Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.”*

The table below sets out how the proposed development will contribute towards achieving the 10 No. NSOs identified in the NPF as follows:

| No. | National Strategic Outcome                                       | How it is addressed by this development   | Criteria met? |
|-----|--|---|---------------|
| 1   | Compact Growth   | Sustainable and efficient redevelopment of an underutilised, greenfield, infill site within the existing settlement of Blessington.   | Yes           |
| 2   | Enhanced Regional Accessibility                                  | Site is proximate to existing bus services and within short walking and cycling distances of the established centre of the town and a host of local services and amenities. Wider connectivity is achieved thanks to proximity to the N81 National Secondary Road.  | Yes           |
| 3   | Strengthened Rural Economies and Communities                     | N/A, as this NSO relates to rural areas.  | N/A           |
| 4   | Sustainable Mobility   | Site ties in with existing infrastructure and the development includes footpaths, cycle tracks and new crossings. It is within reasonable walking and cycling distances of a host of services, facilities and amenities (see also the enclosed <i>Social Infrastructure Audit</i> and <i>Accessibility Report</i> ).  | Yes           |
| 5   | A Strong Economy supported by Enterprise, Innovation, and Skills | <p>The proposed development will accommodate additional residential population, thereby introducing greater spending power within the settlement to support trading businesses and to encourage the establishment of new enterprises.</p> <p>The medical units, café and pharmacy uses will create new employment opportunities and spin-off economic benefits.</p>   | Yes           |
| 6   | High Quality International Connectivity                          | N/A, as the proposed development is principally residential in nature.  | N/A           |
| 7   | Enhanced Amenity and Heritage                                    | <p>The proposed development respects the existing pattern of development in the area, whilst delivering increased densities on this infill site. Archaeological features have been sympathetically incorporated into the development.</p> <p>Only 1 No. tree is proposed for removal, with the hedgerow along the northern intended for retention and protection. New planting will provide ecological and biodiversity benefits.</p> | Yes           |
| 8   | Transition to a Low Carbon and Climate Resilient Society         | The residential development will be delivered to a high-standard, mindful of the need to minimise environmental impacts. The site's proximity to the town centre and day-to-day services, facilities and amenities will encourage active modes of transport, rather than the use of cars. A mix of uses on-site will  | Yes           |

| No. | National Strategic Outcome  | How it is addressed by this development  | Criteria met? |
|-----|---|--|---------------|
|     |   | complement the residential uses and minimise the need to travel.   |               |
| 9   | <b>Sustainable Management of Water, Waste and other Environmental Resources</b> | Nature-based SuDS are proposed as part of the development, and foul will be separate from surface water discharge. Waste generated during construction will be minimised in accordance with the submitted RWMP and waste generated during operation will be minimised and managed in accordance with the submitted OWMP. | Yes           |
| 10  | <b>Access to Quality Childcare, Education, and Health Services</b>              | As demonstrated in the enclosed <i>Social Infrastructure Audit</i> , the proposed development will be adequately served in relation to key social and community infrastructure. Beneficially, the inclusion of a medical centre and the pharmacy will augment local community services.                                  | Yes           |

The above NSOs are supplemented by NPOs, with some of those of relevance to the proposed development outlined below:

**NPO 3a** – *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."*

**NPO 3c** – *"Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints."*

**NSO 4** – *"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

**NSO 5** – *"Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."*

**NSO 6** – *"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."*

**NSO 11** – *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

**NSO 27** – *"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."*

**NSO 28** – *"Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services."*

**NSO 28** – *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*

**NSO 28** – *"Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."*

The development proposed herein is wholly supported by, and supportive of, the foregoing NPOs. As a higher density development of residential units and café/commercial unit, it seeks to sustainably and efficiently use this infill site within the existing Blessington settlement. It integrates with established public transport and will achieve the consolidation of this western edge of the town.

## 6.2 **Urban Development and Building Heights – Guidelines for Planning Authorities**

The *Urban Development and Building Heights: Guidelines for Planning Authorities* (Height Guidelines) established a series of national rules in relation to building heights and new developments. The Height Guidelines were prepared to work in concert with the objectives of the NPF and other national Guidelines for the delivery of sustainable development and compact growth.

The Guidelines are intended to set a more proactive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The Guidelines note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in urban areas, particularly cities and large towns by enhancing both the scale and density of development. Accordingly, the planning process must actively address how this objective will be secured.

The Guidelines remark that:

*"...it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility."*

The Height Guidelines are explicit in their consideration of prevailing heights of development, stressing that such heights should not dictate/constrain the scale of new development, but should still be respected.

Under Specific Planning Policy Requirement 1, Planning Authorities are required to avoid the application of blanket height restrictions, but through the plan-making process, identify areas where increases in height can be pursued:

*"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."*

The *Wicklow County Development Plan 2022–2028* does not appear to have specified heights for Blessington in particular, with the Plan deferring to the Guidelines in its Objective CPO 6.17.

Under Specific Planning Policy Requirement 4, the Guidelines state that:

*"It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more."*

In relation to the first point listed in SPPr 4, we direct the Reader to Section 7.4 below which directly address densities and in the context of the Development Plan and the recently adopted *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities* (2024), which have replaced the *Sustainable Residential Development in Urban Areas Guidelines*.

In relation to the second and third bullet-points, the proposed development has been designed with a range of different dwelling types (houses, duplex apartments and apartment block), sizes (1-bed up to 4-bed) and sizes/designs (1-storey houses up to 5-storey mixed-use block). This results in a differentiated built-form and series of styles, giving variety and intrigue to the design, which has respected existing and emerging patterns of development (see Section 7.3 below). It also broadens the local housing stock, accommodating a diversity of different future residents.

### **6.3 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities**

In 2023, the Irish Government updated the document *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* (Apartment Design Guidelines). The Guidelines set out the preferred locations for apartment developments to encourage higher densities and consolidated residential development, and the development management standards to which they should be designed.

The Apartment Design Guidelines prescribe a series of Specific Planning Requirements (SPPrs) which apartment developments must comply, although with dispensations in some instances. The SPPrs of relevance to the proposed development are identified and responded to below.

#### **Specific Planning Policy Requirements**

##### **Specific Planning Policy Requirement 1:**

*"Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)."*



No HNDA unit mix is contained in the Development Plan. Therefore, the quantitative dwelling mix set by SPPR 1 applies.

Based on the inclusion of 24 No. 1-bed duplex apartments amongst the 48 No. 'standard' housing apartments units and 12 No. 1-bed apartments amongst the 24 No. later living apartment units, there are a total of 36 No. 1-bed apartments, equating to 50.0% of the total apartments. Therefore, the 50% limit is not exceeded and the development is in accordance with SPPR1.

Therefore, the proposed development complies with this SPPR.

### Specific Planning Policy Requirement 3:

*"Minimum Apartment Floor Areas:*

- *Studio apartment (1 person) 37 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*
- *2-bedroom apartment (4 persons) 73 sq.m*
- *3-bedroom apartment (5 persons) 90 sq.m"*

As detailed in the materials prepared by DGA and summarised in Section 7.7.1 below, all units exceed the minimum floor area requirements prescribed. Furthermore, the exceedance of floor areas takes account of the need to allocate additional floor spaces in accordance with "safeguarding higher standards", as required by the supplementary guidance within the Apartment Design Guidelines. In fact, all apartment units exceed the minima by at least 10%.

### Specific Planning Policy Requirement 4:

*"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:*

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.*
- (ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

**Of the apartments:**

- All 48 No. of the 'standard' duplex apartments are dual/triple aspect; and
- 16 No. of the 24 No. LLUs apartments are dual/triple aspect.

Therefore, 64 No. of the 72 No. apartments units – 88.9% – are dual or triple aspect, exceeding the minimum requirements of the Guidelines.

Positively, all of the proposed houses are dual or triple aspect and if included in the calculation, results in a total of 261 No. or 97.0% of units being dual or triple aspect.



### Specific Planning Policy Requirement 5:

*"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality."*

As detailed in the drawings prepared by DGA, all ground floor level apartment units have been designed with floor-to-ceiling heights of at least 2.7 m.

### Specific Planning Policy Requirement 6:

*"A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations."*

As detailed in the drawings prepared by DGA, the apartment/mixed-use block has been designed with 1 No. core to serve up to 6 No. units on a level. Therefore, more than 12 No. units are not served by a single core.

In addition to the above SPPRs, the Apartment Design Guidelines set supplementary guidance and various minimum areas (within units – e.g. storage) and requirements (e.g. communal amenity space). The proposed development complies with these requirements, as relevant and applicable, as detailed in the Sections of this Report below and the materials prepared and submitted by the other members of the Design Team.

## 6.4 Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities

*Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities* (Compact Growth Guidelines) were adopted in January 2024, replacing *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009). Their purpose is to promote and accommodate more sustainable development (residential in particular); setting density standards and a suite of design requirements, such as those relating to parking and public open space.

As with the Apartment Design Guidelines, the Compact Growth Guidelines define a series of SPPRs, as well as a series of 'Policies and Objectives'. The rest of this Sub-Section lists these and provides brief responses to demonstrate the proposed development's compliance with same.

### Specific Planning Policy Requirements

#### SPPR 1 (Separation Distances):

*"It is a specific planning policy requirement of these Guidelines that statutory development plans\* shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving*

*habitable rooms\*\* at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.*

*There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.*

*In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

*\* "Any reference to a statutory development plan(s) in these Guidelines refers to all development plans made under the Planning and Development Act 2000 (as amended) or under any replacement Planning and Development Act, including local area plans and strategic development zones planning schemes.*

*\*\* "Refer to definition in Appendix A: Glossary of Terms." The Appendix defines this as "Primary living spaces such as living rooms, dining rooms, studies and bedrooms."*

*As a general rule, SPPR 1 ultimately requires a separation distance of at least 16 m between opposing windows of habitable rooms at the rear and side of dwellings at above ground floor level. No minimum separation distance applies at ground floor levels or to the front of dwellings.*

*The approach to the design of the proposed development has been to protect and respect residential amenity, whilst aligning with the standard set by the Guidelines. Throughout the development, the minimum separation of 16 m has been applied and this is evident on the *Proposed Site Plan* prepared by DGA. Where less than 16 m between opposing side and rear elevations occurs, the design of the respective units is such as to avoid opposing windows serving habitable rooms, as demonstrated when the Plan is set against the various unit drawings*

*Further detail is contained in Section 7.5 below.*

## **SPPR 2 (Minimum Private Open Space Standards for Houses):**

*"It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:*

- 1 bed house 20 sq.m*
- 2 bed house 30 sq.m*
- 3 bed house 40 sq.m*
- 4 bed + house 50 sq.m*

*A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open*

space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

*Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).*

*For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.*

*In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

SPPR 2 requires houses to be designed to comply with the minimum private open space standards set out above, but that apartments should comply with the private amenity space standards of the Apartment Design Guidelines.

Please refer to DGA's *Housing Quality Assessment* and the explanation with respect to private open/amenity space in Section 7.9 below.

### **SPPR 3 (Car Parking):**

*"It is a specific planning policy requirement of these Guidelines that:*

- (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.*

*Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

Based on the accessibility definitions provided in Table 3.8 of the Guidelines, in our opinion the site falls within the "intermediate and peripheral locations" categorisation. Therefore, a maximum of 2 No. spaces per dwelling applies, albeit requiring justification to the satisfaction of the Planning Authority.

The rates of car parking provision are proposed as follows:

| Dwelling Type | Dwelling Size | Parking Rate | No. Units | Max. Spaces | Provision Rate | Provision |
|---------------|---------------|--------------|-----------|-------------|----------------|-----------|
| Houses        | 2-bed         | 2            | 103       | 206         | 1              | 103       |
|               | 3-bed         | 2            | 70        | 140         | 2              | 140       |
|               | 4-bed         | 2            | 12        | 24          | 2              | 24        |
| Duplexes      | 1-bed         | 2            | 24        | 48          | 1              | 24        |
|               | 3-bed         | 2            | 24        | 48          | 1              | 24        |
| LLUs          | 1-bed         | 2            | 9         | 24          | 0.45           | 5         |
|               | 2-bed         | 2            | 23        | 48          | 0.45           | 11        |
| <b>Total</b>  |               |              | 269       | 538         |                | 331       |

In total, 331 No. residential car parking spaces are proposed to cater for the 269 No. dwellings, equivalent to a car parking ratio of 1.23 (0.45 for the LLUs and 1.35 for the 'standard' dwellings). Therefore, the rate of provision does not exceed the maximum standards set by the Guidelines. Positively, it will promote and support the use of sustainable modes of transport within the settlement, with car parking provision reflective of the expected rates of uses and ownership (generally lower for the LLUs and smaller units and high for the 'standard' and larger units).

#### **SPPR 4 (Cycle Parking and Storage):**

*"It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.*

*The following requirements for cycle parking and storage are recommended:*

- (i) *Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) *Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided."*

Due to the various housing typologies and to avoid unnecessary duplication of text, we direct the Council to Section 7.8.2 below for details.

## Policies and Objectives

### Policy and Objective 3.1 (Densities)

*"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."*

To augment this, we contend that Blessington falls within the category of 'Key Town and Large Town (5,000+ population)', as detailed in Section 3.3.3 of the Guidelines, which state:

*"Key Towns are identified in the RSEs, while Large Towns are identified at a county level. The strategy for Key Towns and Large Towns is to support consolidation within and close to the existing built-up footprint."*

Blessington has a population (as of 2022) of 5,611 people and is listed as a 'Large Town' in the Development Plan's settlement hierarchy. Based on the location and zoning of the subject site, a case could be made for defining the subject site as being in a 'Centre or Urban Neighbourhood'. However, we contend that the 'Suburban/Urban Extension' is a more accurate reflection of the fact that the site is undeveloped/greenfield, contiguous to existing development (as an infill site) and only partially comprised of a town centre zoning.

In relation to "suburban/urban extension" locations, the Guidelines state:

*"Suburban areas are the low density car orientated residential areas constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that **residential densities in the range 30 dph [dwellings per hectare] to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns**, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8)."* **[emphasis added]**

Consequently, a net density in the range of 30–50 units per hectare (uph) should be sought.

Given the full detail and justification required, we direct the Reader to Section 7.4 below.

### Policy and Objective 4.1 (DMURS)

*"It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking."*

The proposed development has incorporated the principles, approaches and standards of the Design Manual for Urban Roads and Streets (DMURS) in its design. This is evident in the drawings prepared by DGA and DBFL, and as espoused in the DMURS Design Statement prepared by the latter.



## Policy and Objective 4.2 (Quality Urban Design and Placemaking)

*"It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications."*

The "key indicators of quality urban design and placemaking" set out in Section 4.4 of the Guidelines fall under the headings of:

- **"Sustainable and Efficient Movement"**

*"Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars."*

- **"Mix and Distribution of Uses"**

*"Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice."*

- **"Green and Blue Infrastructure"**

*"Placing and [sic] emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities."*

- **"Responsive Built Form"**

*"Placing an emphasis on the creation of a coherent urban structure and design approach that responds to local character and is attractive."*

### **"Sustainable and Efficient Movement"**

The proposed development integrates with the existing footpath and cycle track networks of the town, which includes segregated infrastructure to the immediate west of the site. This will accommodate and promote sustainable and healthy active modes to avail of Blessington's local services, amenities and facilities (see enclosed *Social Infrastructure Audit*). Bus services are also within short walking distances, thereby allowing for onward connections.

The internal network includes a series of safe routes for pedestrian and cyclists, including homezones. Connections to immediately adjoining developments to the north, west and east will enhance permeability and mitigate the need for overly circuitous access/egress routes.

### **"Mix and Distribution of Uses"**

The development includes different residential typologies to meet broaden the housing stock available within the town and the meet the unique needs of older members of the community. The LLUs are positioned close to the town centre to make movement to avail of its services quicker and easier, whilst doing so allows for an expression of greater (4-storey block) built-form.

A medical centre, café and pharmacy will activate the ground floor level and connect the development with the mix of uses to the south-east.

Importantly, the additional residential units will support the creation of the critical mass required to sustain existing and promote the creation of new businesses.

**"Green and Blue Infrastructure"** (We note that later in the Guidelines **"Public Open Space"** is included as an apparent fifth key indicator, so is incorporated below.)

The development seeks to retain the northern hedgerow and provides an appropriate riparian buffer to the watercourse in the northern corner.

Carefully considered landscaping and planting throughout the development will enhance the site's otherwise limited ecological/biodiversity value.

SuDS, including nature-based options, feature across the development; integrating surface water management with green infrastructure.

**"Responsive Built Form"**

The proposed site layout and its built-form are set out to positively respond to the receiving environment and prevailing context. The 5-storey mixed-use block at the south creates a constructive relationship with the 5-storey mixed-use development to its south-east. An appropriate transition is then achieved, with the development stepping down to 3 No. storeys along the site's western boundaries, thereby creating a defined, robust urban edge fronting the link road and Blessington Inner Relief Road.

The built-form then steps down in height to 1 No. and 2 No. storeys within the site, although with some 3-storey dwellings at corners to improve legibility and wayfinding.

## Policy and Objective 5.1 (Public Open Space)

*"It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.*

*In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.*

*In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.*

*In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the*

*planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site."*

*The quantum of public open space proposed equates to 15% of the net developable area. For full details and explanation in relation to its provision, we direct the Council to Sections 7.9.1.1 and 7.9.2 below.*

## 6.5 ***The Planning System and Flood Risk Management: Guidelines for Planning Authorities***

*The Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009) provide detailed guidance for (i) Planning Authorities to have regard to in the preparation of Statutory Plans, and (ii) Competent Authorities to have regard to in assessing Planning Applications. The Core Objectives of the Guidelines are stated as being to:

- *"Avoid inappropriate development in areas at risk of flooding;*
- *Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;*
- *Ensure effective management of residual risks for development permitted in floodplains;*
- *Avoid unnecessary restriction of national, regional or local economic and social growth;*
- *Improve the understanding of flood risk among relevant stakeholders; and*
- *Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management."*

As discussed in Section 7.10 below, a *Site Specific Flood Risk Assessment* has been prepared and enclosed. The Council is directed to same for a detailed, localised assessment; however, we have extracted the following conclusions:

*"The Site-Specific Flood Risk Assessment for the proposed development in Blessington was undertaken in accordance with the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and its Technical Appendices.*

*Following the Flood Risk Assessment, it has been determined that all developable land within the site is located in Flood Zone C as defined by the Guidelines.*

*The area where flood Zone A encroachment on the site is not proposed for development and therefore does not affect the classification of the portion of the site which is being developed.*

*It is concluded that the;*

- *Proposed development is appropriate for the site's flood zone category.*
- *The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.*

*In conclusion, the proposed development is considered to have the required level of flood protection."*

## 6.6 ***Design Manual for Urban Roads and Streets***

The proposed development has been designed in accordance with the principles of the *Design Manual for Urban Roads and Streets* (2019) (DMURS), which prioritises active and public modes

of transport over the use of the private car, seeks to create safer and more accessible environments, and supports the integration of transport infrastructure and land-uses.

For details of the proposed development's compliance with DMURS, please refer to the enclosed drawings and reports prepared by DBFL. Of note is the *DMURS Design Statement*, which provides key insights.

## 6.7 ***Childcare Facilities: Guidelines for Planning Authorities***

National guidance with respect to Childcare Facilities is principally contained in the *Childcare Facilities: Guidelines for Planning Authorities* (2001) (Childcare Facilities Guidelines). They were drafted to provide Planning Authorities and Developers with guidance in relation to the provision of Childcare Facilities, in terms of their location, scale and design.

In relation to the extent of provision, the Childcare Facilities Guidelines state that 1 No. Childcare Facility should be provided for larger residential developments unless there are genuine reasons to the contrary:

*"Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments. For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate. **The threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.** Authorities could consider requiring the provision of larger units catering for up to 30/40 children in areas of major residential development on the basis that such a large facility might be able to offer a variety of services – sessional/drop in/after-school, etc."*

The provision of Childcare Facilities is further elaborated in Section 3.3.1 of the Guidelines, which states that "a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate" for residential developments. The Guidelines additionally provide information on, *inter alia*: (i) minimum clear floor area and (ii) operational / management requirements.

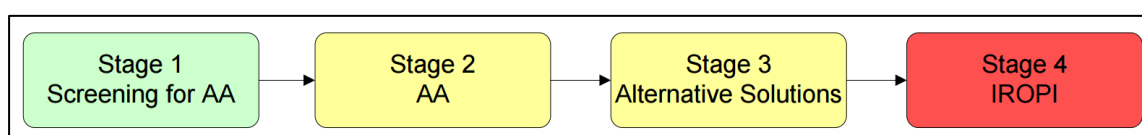
Based on the guidance above and that provided in the more contemporary *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*, it is necessary to determine if, and to what extent, childcare requirements exist on a case-by-case, project-by-project basis. For this project, this analysis was undertaken in the *Social Infrastructure Audit* (enclosed under separate cover). Therein, it was determined that demand for childcare places would be limited to approximately just 11 No., with existing facilities having adequate physical space to accommodate this uplift and 2 No. other childcare facilities proposed in developments elsewhere in Blessington. In light of this, it was concluded that providing another such facility would not be needed and could, in fact, result in an overprovision in the town, thereby potentially impacting the operational viability of all such facilities.

For further insights, please refer to Section 4.2 of the *Social Infrastructure Audit* and to the response prepared in respect of 'Reason for not constituting a reasonable basis on which to make an application – (iii)' in the *Statement of Response to LRD Opinion*.

## 6.8 **Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities**

The undertaking of Appropriate Assessment is to ensure the protection and integrity of statutorily protected environments / sites. These sites are protected by the Birds Directive (2009/147/EC (as amended)) and the Habitats Directive (1992/43/EEC (as amended)), and by Natura 2000. In Ireland, such areas are identified as: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Appropriate Assessment, as set out in the *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009), is "an impact assessment process that fits within the decision-making framework", albeit "the requirement [to undertake Appropriate Assessment] is not to prove what the impacts and effects will be[, if any], but rather to establish beyond reasonable scientific doubt that adverse effects on site integrity will not result".

As shown in Figure 6.1, there are 4 No. principal stages to Appropriate Assessment. For the Mixed-Use Development proposed on the subject site, the enclosed *Appropriate Assessment Screening Report* (prepared by Openfield) screened out, at Stage 1, that the proposal would have "adverse effects" on the integrity of Natura 2000 sites.



**Figure 6.1: The 4 No. Stages of the Appropriate Assessment Process**

(Source: *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009))

With respect to impacts on protected Natura 2000 sites, the enclosed *Appropriate Assessment Screening Report* prepared by Openfield concluded the following:

*"No significant effects will arise from this project to the Poulaphouca Reservoir SPA or any Natura 2000 site.*

*In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.*

*On the basis of the screening exercise carried out above, it can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded on the basis of the best scientific knowledge available."*

## 6.9 **Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019–2031**

The *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019–2031* (RSES) was published on 26<sup>th</sup> June 2019. Contained within this new regional planning document are Regional Policy Objectives (RPOs) which are intended to contribute to the sustainable planning and development of the region over the life of the Strategy to 2031, although with a vision to 2040. Many of the RSES's RPOs complement those of the NPF with respect to the sustainable growth and consolidated development of the region. The Regional Strategic Outcomes (RSOs) – which the RPOs seek to attain – are summarised in Figure 6.2.



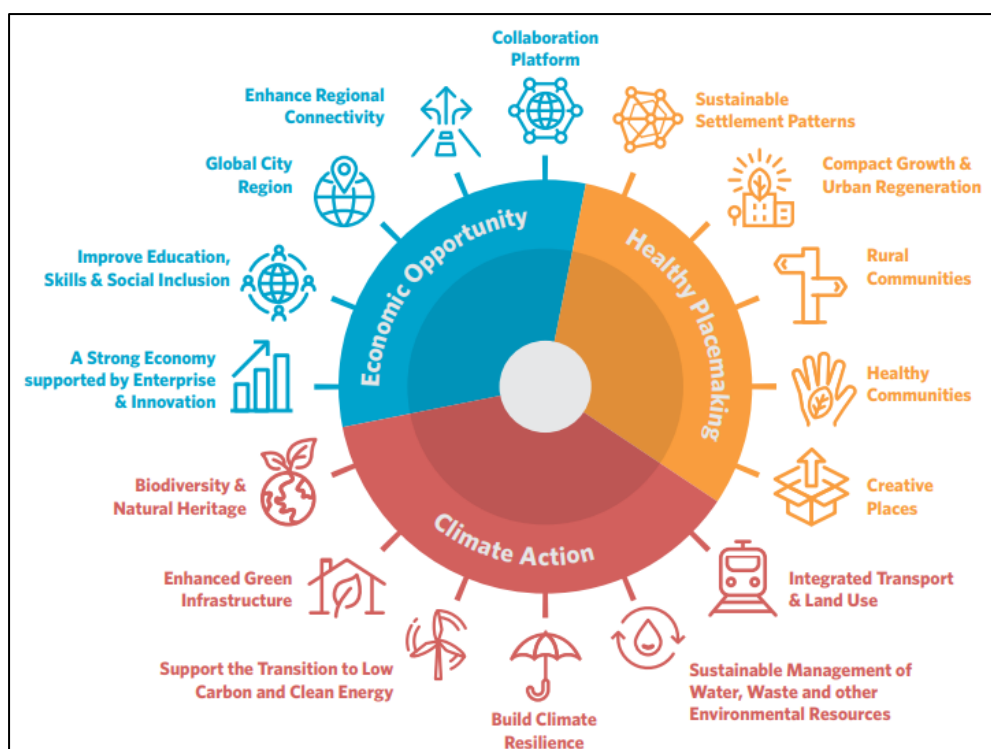


Figure 6.2: Regional Strategic Outcomes of the RSES

Source: *Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (2019)*

There are 16 No. RSOs which facilitate the implementation of NPF policies. Of importance to the proposed development are the following:

**RSO No. 2 (Compact Growth and Urban Regeneration)** – “Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region’s citizens. (NSO 1).”

**RSO No. 4 (Healthy Communities)** – “Protect and enhance the quality of our built and natural environment to support active lifestyles including walking and cycling, ensure clean air and water for all and quality healthcare and services that support human health. (NSO 10)”

**RSO No. 6 (Integrated Transport and Land Use)** – “Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8,9)”

**RSO No. 7 (Sustainable Management of Water, Waste and Other Environmental Resources)** – “Conserve and enhance our water resources to ensure clean water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy. (NSO 8, 9)”

**RSO No. 8 (Build Climate Resilience)** – “Ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region. (NSO 8, 9)”

**RSO No. 9 (Support the Transition to Low Carbon and Clean Energy)** – “Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed

*renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)”*

**RSO No. 10 (Enhanced Green Infrastructure)** – *“Identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands woodlands and wetlands. (NSO 8, 9)”*

**RSO No. 11 (Biodiversity and Natural Heritage)** – *“Promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection. (NSO 7, 8)”*

The proposed development aligns with these RSOs by the creation of more sustainable, dense, compact and connected urban areas. It ultimately complements the Spatial Strategy of the RSES, which:

*“...combines the growth of Dublin and regional centres with a selected number of large self-sustaining settlements that have the assets and capacity to grow in a sustainable manner while minimising impacts on the receiving environment. This option offers the best opportunity to align services with population and economic growth, promote compact growth in urban settlements and make the best use of infrastructure including public transport thereby reducing transport emissions and improve regional accessibility.”*

The subject site’s proximity to bus services, its immediate adjacency to the town centre and walking distance to a host of key services, facilities and amenities tie in with the aim of integrating land-use and transport, shifting away from an overreliance on private car use in favour of active and public modes.

Careful and considered design will bolster biodiversity and ecology, as well as protected designated habitats. This includes the enhancement of green infrastructure by the retention of existing vegetation and assets, and its augmentation with new planting and features.

## 6.10 Wicklow County Development Plan 2022–2028

The following Sub-Sections provides an overview of the proposed development’s consistency with the relevant policies and objectives of the *Wicklow County Development Plan 2022–2028*.

### 6.10.1 Chapter 4 – Settlement Strategy

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
| CPO 4.1                   | To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into key towns, self-sustaining growth towns, self-sustaining towns and small towns. | <p>The proposed development will support the attainment of this CPO by delivering much-needed housing on a vacant site in the centre of Blessington, which is identified as a self-sustaining growth town per the Wicklow Settlement Hierarchy.</p> <p>Additional population will create the critical mass necessary to sustain</p> |

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
|                           |  | local business and support the provision of existing and new services.  |
| CPO 4.2                   | To secure compact growth through the delivery of at least 30% of all new homes within the built-up footprint of existing settlements by prioritising development on infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites.   | The proposed development is located at a centrally located, vacant, infill site. Its delivery will increase the residential density and land-use intensity in the settlement, supporting the drive to realise at least 30% of new residential dwellings within built-up envelopes.              |
| CPO 4.3                   | Increase the density in existing settlements through a range of measures including bringing vacant properties back into use, reusing existing buildings, infill development schemes, brownfield regeneration, increased building height where appropriate, encouraging living over the shop and securing higher densities for new development. | The mix of uses will further broaden the town centre's offering and complement each other (e.g. the medical centre and the pharmacy). These uses will also create employment opportunities.   |
| CPO 4.5                   | To ensure that all settlements, as far as is practicable, develop in a self-sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.                                      | Combined with existing uses, they will support the creation of a more self-sufficient settlement, reducing reliance on the services and amenities of other settlements both inside and outside County Wicklow.  |
| CPO 4.6                   | To require new housing development to locate on designated housing land within the boundaries of settlements, in accordance with the development policies for the settlement.  | Importantly, delivering more homes and community and commercial uses at a central location will reduce dependency on private car usage. It will promote active travel and facilitate integration with the town's public transport connections, given the proximity to bus stops on Main Street. |
| CPO 4.7                   | To implement the Core Strategy and Settlement Strategy, to monitor development and the delivery of services on an ongoing basis and to review population targets where service delivery is impeded.  | The proposed development accords with the provisions of the Core Strategy and will play a key role in its achievement; delivering housing, ensuring compact growth and utilising centrally located, vacant land.  |
| CPO 4.9                   | To target the reversal of town and village centre decline through sustainable compact growth and targeted measures that address vacancy, dereliction and underutilised lands and deliver sustainable renewal and regeneration outcomes.  | As a relatively dense scheme that abuts the town centre and even benefits from a 'town centre' zoning, the development will augment the critical mass required to counter the town centre's decline. Some 269 No. units will introduce substantial  |

| Policy / Objective Number | Policy / Objective | Comment   |
|---------------------------|--------------------|---|
|                           |                    | <p>additional 'spend' to sustain businesses and the provision of services.</p> <p>As noted above, the development is proposed on a vacant, infill site, thereby representing a sustainable use of land.</p> |

#### 6.10.2 Chapter 5 – Placemaking for Town and Village Centres

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 5.6                   | To seek funding and focus new investment into the core of towns and villages in order to reverse decline, foster resilience and encourage new roles and functions for streets, buildings and sites within towns and villages.  | <p>In respect of these CPOs, we note that that the proposal is sited on a currently vacant, infill site.</p> <p>The development has been carefully and attractively designed, incorporating a range of housing typologies that will accommodate additional population (thus critical mass to support services and businesses) and uses that will increase economic activity and employment opportunities.</p> <p>The built-form of the proposal provides interest and will augment the existing urban environment, whilst improving pedestrian and cyclist permeability and safety; key to supporting active modes which invigorate existing town centres.</p> |
| CPO 5.8                   | To target development that will regenerate and revive town and village centres, address dereliction and vacancy and deliver sustainable reuse and quality placemaking outcomes.  |  |
| CPO 5.9                   | To facilitate and support well-designed development that will contribute to regeneration and renewal, consolidation of the built environment and include interventions in the public realm and the provision of amenities.   |  |
| CPO 5.11                  | To identify obsolete and potential renewal areas within town and village centres and facilitate the re-use and regeneration of these areas and derelict lands and buildings with a view to consolidating the core of town and village centres.   |  |
| CPO 5.12                  | To encourage the redevelopment of brownfield sites in order to maximise the sustainable regeneration of underutilised/vacant lands and/or buildings particularly in town and village centres.  |  |
| CPO 5.13                  | <p>In many settlements in the County, there are sites and areas in need of development and renewal, in order to prevent:</p> <ul style="list-style-type: none"> <li>a. adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land,</li> <li>b. urban blight and decay,</li> <li>c. anti-social behaviour, or</li> <li>d. a shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses</li> </ul> <p>It is an objective of this plan to encourage and facilitate the appropriate development of such sites / lands and all</p> |  |

| Policy / Objective Number       | Policy / Objective  | Comment   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
|---------------------------------|---|---|---------------------|-----------------|--|------------------------|--|------------------------|--|---------------------------------|---|-------------|------------------|---|
|                                 | <p>available tools and mechanisms, including the Vacant Site levy, may be utilised to stimulate such development.</p> <p>In this regard, plans for towns in Levels 4 and 5 of the settlement hierarchy include a map showing the area within the town where it is deemed that renewal and regeneration is required and these areas will be examined in detail to determine if there are sites where the Vacant Site Levy should be applied.</p> <p>In addition, the following zones in larger towns (with stand alone plans) may include sites that are in need of renewal and regeneration, and these areas will be examined in detail to determine if there are sites where the Vacant Site Levy should be applied.</p> <table><tr><th>Settlement</th><th>Zones<sup>12</sup></th></tr><tr><td>Bray &amp; Environs</td><td>Town Centre (TC), Neighbourhood Centre (NC), Seafront Zone (SF), Gateway &amp; Transport Hub (GTH), Mixed Use (MU)</td></tr><tr><td>Wicklow Town &amp; Rathnew</td><td>Town Centre (TC), Village Centre (VC), Port (PT), Mixed Use (MU)</td></tr><tr><td>Arklow Town &amp; Environs</td><td>Town Centre (TC), Waterfront Zone (WZ)</td></tr><tr><td>Greystones - Delgany &amp; Kilcoole</td><td>Town Centre (TC), Village Centre (VC), Small Local Centre (SLC)</td></tr><tr><td>Blessington</td><td>Town Centre (TC)</td></tr></table> | Settlement  | Zones <sup>12</sup> | Bray & Environs | Town Centre (TC), Neighbourhood Centre (NC), Seafront Zone (SF), Gateway & Transport Hub (GTH), Mixed Use (MU) | Wicklow Town & Rathnew | Town Centre (TC), Village Centre (VC), Port (PT), Mixed Use (MU) | Arklow Town & Environs | Town Centre (TC), Waterfront Zone (WZ) | Greystones - Delgany & Kilcoole | Town Centre (TC), Village Centre (VC), Small Local Centre (SLC) | Blessington | Town Centre (TC) | <p>Positively, the proposal will deliver much needed development on a TC-zoned (and R1-zoned) site, which is vital to sustainable urban development and regeneration, whilst following a plan-led approach to sequential and sustainable development.</p> |
| Settlement                      | Zones <sup>12</sup>   |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| Bray & Environs                 | Town Centre (TC), Neighbourhood Centre (NC), Seafront Zone (SF), Gateway & Transport Hub (GTH), Mixed Use (MU)  |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| Wicklow Town & Rathnew          | Town Centre (TC), Village Centre (VC), Port (PT), Mixed Use (MU)  |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| Arklow Town & Environs          | Town Centre (TC), Waterfront Zone (WZ)  |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| Greystones - Delgany & Kilcoole | Town Centre (TC), Village Centre (VC), Small Local Centre (SLC)   |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| Blessington                     | Town Centre (TC)  |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| CPO 5.14                        | Promote the Town and Village Renewal Scheme as an enabler to bring vacant and derelict buildings and sites back into use as multi-purpose spaces and for residential occupancy.   |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| CPO 5.16                        | To actively pursue and implement environmental and public realm improvements and provision of amenities that create more attractive places and encourage healthier lifestyles for all ages and abilities.   | The proposal incorporates a range of public open spaces that will include play areas and seating, as well as attractive planting. This will encourage physical activity as well as socialising, to the benefit of all members of the community. |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| CPO 5.17                        | To harness and integrate the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive reuse, recognising its important contribution to placemaking. New development should respect and complement the historic fabric of existing towns and villages – the traditional street patterns, plot sizes, mix of building types, distinctive paving and attractive street furniture.  | The scheme proposes to retain 2 No. notable heritage features on-site: (1) the barrow archaeological feature in the middle of the site, and (2) the northern hedgerow/treeline.   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |
| CPO 5.18                        | To protect, integrate and enhance heritage assets, including attractive streetscapes and historic buildings, through appropriate reuse and regeneration and restrict  |   |                     |                 |  |                        |  |                        |  |                                 |   |             |                  |   |



| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | inappropriate development that would undermine the settlement's identity, heritage and sense of place.  | We contend that at this site, there are no traditional street patterns, plot sizes, mix of buildings, distinctive paving or street furniture to be retained or formally complemented.  |
| CPO 5.21                  | To strengthen the urban structure of towns and villages by ensuring that any new development contributes to a coherent urban form, focused on a high quality built environment of distinct character. New development shall incorporate a legible and permeable urban form that protects and complements the character of the street or area in which it is set in terms of proportion, enclosure, building line, design and by the marrying of new modern architecture with historic structures. | <p>It has been presented in the <i>Architectural Design Statement</i> prepared by DGA and the <i>Landscape Design Statement</i> prepared by Ilsa Rutgers that the proposal is highly legible and permeable. For example, a new 3-metre wide pedestrian and cycle runs through the site, from the Blessington Inner Relief Road to the north-west to the link street to the south, reducing travel times and taking vulnerable road users of the road network.</p> <p>The development positively responds to height in the environs, delivering 5 No. storeys adjacent to the existing 5-storey building to the south-east, but transitioning down to 3 No, 2 No. and 1 No. storeys in different places across the site. This variety creates interest and ensures that existing heights and built-forms are respected.</p> |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           |  | The scheme is of a scale that allows for the generation of its own character area, with 2 No. of which presented to the Planning Authority defined by complementary variations to materiality and finishes, but also scales of development and uses.   |
| CPO 5.22                  | Within town and village centres, particularly the retail core, new development is required to provide for active street edges. Ground floor units should be occupied predominantly by uses that promote a high level of activity and animation. In order to maximise street activity, set-backs should be minimised and there should be a high frequency of entrances (every 5 to 10 metres).  | The medical centre, café and pharmacy units are active, vibrant street frontages at the southern 'corner' of the site. They will complement, and be complemented by, the public plaza area.  |
| CPO 5.23                  | To require that new town centre development particularly public realm improvement works incorporates the principles of universal design to create an environment that is accessible, usable, convenient and a pleasure to use for all users  | The principles of universal design have been incorporated into the proposed development. Please refer to DGA's <i>Universal Design Statement</i> .   |
| CPO 5.24                  | In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town / city cores, planning authorities are required to explicitly identify areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the NPF and RSES. In this regard, the identification of locations for increased building height shall be carried out in the preparation of Local Area Plans for settlements in Tiers 1-3 of the County Settlement Hierarchy as these are deemed the only settlements of sufficient scale and diversity in urban grain to accommodate such increases in height | The site, due to its zoning, centrality and context, is deemed to be an appropriate location at which to propose some slightly taller structure (i.e. up to 5 No. storeys). This was advocated for by the Council during consultations and is now proposed as part of the development.<br><br>Please refer to section 7.3.2 below for further details. |

### 6.10.3 Chapter 6 – Housing

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
| CPO 6.1                   | New housing development shall be required to locate on suitably zoned or designated land in settlements and will only be considered in the open countryside when it is for the provision of a rural dwelling for those with a demonstrable housing social or economic need to live in the open countryside. | The proposed dwellings are proposed on R1- and TC-zoned lands, which include 'residential' as a <i>"permitted in principle use"</i> .   |
| CPO 6.2                   | The sale of all developments of residential units, whether houses, duplexes or apartments, to commercial institutional investment bodies shall be prohibited.   | This is noted and a condition defining same is expected.  |
| CPO 6.3                   | New housing development shall enhance and improve the residential amenity of any location, shall provide for the highest possible standard of living of occupants and in particular, shall not reduce to an unacceptable degree the level of amenity enjoyed by existing residents in the area.             | The development proposal includes a series of residential dwellings that exceed the minimum internal floor space and private amenity space requirements set by planning policy. This is evident in Section 7.7 below.   |
| CPO 6.4                   | All new housing developments (including single and rural houses) shall achieve the highest quality of layout and design, in accordance with the standards set out in the Development and Design Standards (Appendix 1) and the Wicklow Single Rural House Design Guide (Appendix 2).                        | <p>In relation to daylight and sunlight of the proposed development:</p> <ul style="list-style-type: none"> <li>• In the 3 No. scenarios defined by trees and times of year, in excess of 97% of rooms comply with the BRE 209 standard for daylight;</li> <li>• In the 2 No. scenarios defined by trees, in excess of 96% of units are compliant with the BRE 209 standard for sunlight; and</li> <li>• All proposed open spaces exceed the minimum requirements for sunlighting.</li> </ul> <p>Summary details are provided in Section 7.7.7 below and in 3D Design Bureau's enclosed <i>Daylight and Sunlight Assessment Report</i>.</p> <p>In relation to impacts on the residential amenity of neighbouring developments, ample separation distances are proposed (see DGA's <i>Proposed Site Layout Plan</i>) and existing features such as the</p> |

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
|                           |   | <p>northern hedgerow are proposed for retention, protecting this screening/buffer.</p> <p>With respect to daylighting impacts, of the 39 No. windows assessed, 36 No. will only be negligibly affected and just 3 No. (7.7%) of those assessed will have minor adverse effects. These are limited effects and we contend that they will <i>"...not reduce to an unacceptable degree the level of amenity enjoyed by existing residents in the area."</i> Please refer to 3D Design Bureau's <i>Daylight and Sunlight Assessment Report</i> for further details.</p>   |
| CPO 6.5                   | <p>To require that new development be of the highest quality design and layout and contributes to the development of a coherent urban form and attractive built environment in accordance with the following key principles of urban design:</p> <ul style="list-style-type: none"> <li>• Strengthening the character and urban fabric of the area;</li> <li>• Reinforcing local identity and sense of place;</li> <li>• Improving and enhancing the public realm;</li> </ul> | <p>The quality of the proposed development is evident in the materials prepared by the Design Team. However, please find a series of brief, bullet-point responses below:</p> <ul style="list-style-type: none"> <li>• The development will deliver much needed housing to the town, with 2 No. unique character areas proposed. Given the site's slight remove from Main Street, it affords the opportunity to propose a different style of design. Urban fabric is currently of limited quality in this area due to the subject site's undeveloped nature, the dominance of road infrastructure and the presence of the 5-storey mixed-use development at Dunnes Stores, which severs a 'line of sight' connection with Main Street. Therefore, the proposal will generate its own character, fabric and sense of place, whilst knitting into the established nature of the town.</li> <li>• The development incorporates archaeological features,</li> </ul> |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | <ul style="list-style-type: none"> <li>• Optimise the opportunities afforded by the historical and natural assets of a site / area;</li> <li>• Conserving and respecting local heritage;</li> <li>• Providing a coherent, legible and permeable urban structure;</li> <li>• Providing ease of movement and resolving conflict between pedestrians/cyclists and traffic;</li> <li>• Promoting accessibility for all;</li> <li>• Promoting an efficient use of land;</li> <li>• Cognisance of the impact on climate change and the reduction targets for carbon emissions set out by the Government.</li> </ul> | <p>ensuring the connection to the past, whilst also retaining the northern hedgerow and stepping development away from the watercourse to the north.</p> <ul style="list-style-type: none"> <li>• The development is highly legible and permeable. The internal road, cycle and pedestrian network will support safe, fluid and easy movement, whilst improving connectivity by way of the series of proposed crossing points. The position of taller buildings has been carefully considered as a means of enhancing navigability and wayfinding and the creation of a sense of place.</li> <li>• At a density of 51.2 dph and with the inclusion of 269 No. dwellings and 399 sqm of community and commercial floor space in 3 No. units, the development is an efficient use of land, especially given the site's current vacancy and underutilisation.</li> <li>• Delivery of housing within the settlement and in close proximity to public transport options and a range of services, facilities and amenities will play an important role in mitigating environmental impact and climate changes, especially noting the higher BER envisaged for the proposed dwellings.</li> </ul> |
| CPO 6.6                   | To require that all planning applications for multi-unit residential development are accompanied by a Design Statement. Design Statements shall include a detailed assessment of existing environment and historic character and  | An <i>Architectural Design Statement</i> has been prepared by DGA and is enclosed under separate cover.  |



| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | demonstrate how the design has evolved in response to these underlying characteristics and fabric of the town / village. The Design Statement should address each of the 12 criteria set out in the Urban Design Manual (DECLG May 2009). The layout, access, road widths and open space should be cognisant of town and village character.   |  |
| CPO 6.7                   | The design and layout of new residential and mixed-use development shall deliver highly permeable, well connected streets which facilitate active street frontage in accordance with best practice set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DEHLG May 2009) and the Design Manual Urban Roads and Streets (DTTS & DECLG 2013).  | It has been presented in the <i>Architectural Design Statement</i> prepared by DGA and the <i>Landscape Design Statement</i> prepared by Ilsa Rutgers that the proposal is highly legible and permeable. For example, a new 3-metre wide pedestrian and cycle runs through the site, from the Blessington Inner Relief Road at the north-west to the link street at the south-east, reducing travel times and taking vulnerable road users of the road network.  |
| CPO 6.8                   | Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time and in particular to require that all new residential developments in excess of 20 residential units to provide a minimum 5% universally designed homes in accordance with the requirements of 'Building for Everyone: A Universal Design Approach and the Universal Design Guidelines for Homes in Ireland (2015) <sup>11</sup>                   | According with this objective, the 1-bed ground floor level duplex apartments (standard housing) (24 No.), the single-storey LLU houses (7 No.) and the LLU apartments (24 No.) have been designed in accordance with universal design principles. These 55 No. units (20.4% of the total) are designed to allow for ease of access, internal movement and habitation for persons with mobility impairments. They also include key features to allow for their adaptation and reconfiguration (e.g. 'soft' walls). |
| CPO 6.9                   | To implement the provisions of the Wicklow Housing Strategy and in particular, to apply a 10% (or a greater percentage if provided for in future legislation) social housing requirement pursuant to Part V of the Planning and Development Act 2000 (as amended) to land zoned for residential use, or for a mixture of residential or other uses, except where the development would be exempted from this requirement. In certain circumstances, as set out in the | <p>The Applicant will comply with their Part V obligations, as established by legislation.</p> <p>Details of the 27 No. dwellings proposed for Part V (10% requirement applicable) are indicated in Section 7.13 below and in the enclosed materials.</p>  |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           | Affordable Housing Act 2021, this requirement will be 20% devoted to social and affordable housing   |  |
| CPO 6.10                  | To ensure the selection of lands or housing units to purchase or lease by the Council, including Part V, counteracts undue segregation by persons of different social backgrounds.   |  |
| CPO 6.16                  | To encourage and facilitate high quality well-designed infill and brownfield development that is sensitive to context, enables consolidation of the built environment and enhances the streetscape. Where necessary, performance criteria should be prioritised provided that the layout achieves well designed high quality outcomes and public safety is not compromised and the environment is suitably protected.  | <p>The development is proposed on a vacant infill site. Its scale, massing and height, and their dispositions, are respectful of the context. Overbearance, overlooking and overshadowing to the detriment of residential amenity has been avoided.</p> <p>The density of 51.2 dph and the mix of uses will ensure an efficient and sustainable use and consolidation of the site within the existing settlement.</p>  |
| CPO 6.13                  | <p>To require that new residential development represents an efficient use of land and achieves the minimum densities as set out in Table 6.1 subject to the reasonable protection of existing residential amenities and the established character of existing settlements. In promoting higher densities and more compact development, new development should demonstrate compliance with:</p> <ul style="list-style-type: none"> <li>the Sustainable Urban Housing Guidelines for Planning Authorities (DEHLG 2009) and accompanying Urban Design Manual – A Best Practice Guide;</li> <li>Quality Housing for Sustainable Communities (DoEHLG 2007);</li> <li>Design Standards for New Apartments Guidelines for Planning Authorities (2018)</li> <li>Design manual for Urban Roads and Streets; and</li> <li>any subsequent Ministerial guidelines.</li> </ul> | <p>In accordance with this CPO and Table 6.1 of the Development Plan, we note that a density of at least 50 dph applies to the subject site. We also note the guidance of the Compact Growth Guidelines</p> <p>As demonstrated in Section 7.4 below, a density of 51.2 dph is proposed.</p> <p>It is illustrated in the suite of materials prepared by the Design Team that this density is carefully and considerately proposed in an attractive manner.</p> <p>As stated in response to the CPOs above, the density is achieved whilst balancing existing residential amenities.</p> <p>A variety of housing types and sizes are proposed:</p> |
| CPO 6.14                  | To densify existing built-up areas subject to the adequate protection of existing residential amenities.   | <ul style="list-style-type: none"> <li>Houses, apartments, duplexes;</li> </ul>  |

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
| CPO 6.15                  | Higher density proposals should be designed to a high standard, incorporate a mix of housing types and sizes and deliver compact urban forms that enhance the local built environment and contribute towards a sustainable mix of housing options. Proposals should provide an appropriate design response to the site, be designed to a high quality and afford adequate protection for residential amenity of neighbouring properties.   | <ul style="list-style-type: none"> <li>• 1-bed up to 4-bed; and</li> <li>• 'Standard' and 'later living' occupancies.</li> </ul>  |
| CPO 6.17                  | <p>To facilitate development incorporating higher buildings (i.e. buildings that exceed the contextual prevailing height) where it has been adequately demonstrated that the development complies with the assessment criteria set out in Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) or any subsequent height guidelines.</p> <p>In accordance with the SPPR 3 of Urban Development and Building Heights Guidelines, where:</p> <ul style="list-style-type: none"> <li>• an applicant for planning permission sets out how a development proposal complies with the Urban Development and Building Heights Guidelines, particularly SSPR<sub>1</sub> and SPPR<sub>2</sub> thereof; and</li> <li>• the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and Guidelines;</li> </ul> <p>then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p> <p>In accordance with the SPPR 1 of Urban Development and Building Heights Guidelines, Planning Authorities are</p> | <p>The proposed development ranges in height from 1 No. to 5 No. storeys. Therefore, it reflects prevailing patterns and scales of development in the area and is not considered to be in excess of same. Accordingly, formal demonstration of compliance with the SPPRs of the <i>Urban Development and Building Heights Guidelines for Planning Authorities</i> (2018) is not required.</p> <p>Notwithstanding same, a justification in support of the proposed building heights and their distribution across the site is presented in Section 7.3.2 below.</p> <p>We contend that the proposed heights facilitate an appropriate density and intensity of development, reflective of the site's zoning and location.</p> <p>The height is delivered in a manner that respects its environs and the disposition of height on adjacent sites, with the proposed 5 No. storeys opposing the existing 5 No. storeys, transitioning downwards to 3 No., 2 No. and 1 No. storeys.</p> <p>No negative impacts on views and vistas or historic character are anticipated.</p> |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | required explicitly identify areas where increased building height will be actively pursued for redevelopment, regeneration and infill development to secure the objectives of the NPF and RSES. In this regard, the identification of locations for increased building height shall be carried out in the preparation of Local Area Plans for settlements in Tiers 1-3 of the County Settlement Hierarchy as these are deemed the only settlements of sufficient scale and diversity in urban grain to accommodate such increases in height.   |  |
| CPO 6.18                  | <p>To ensure that building height within future development makes a positive contribution to the built form of the area, is not obtrusive and does not adversely impact on the streetscape, local amenity or views. Require all development proposals, including infill development, to include an analysis of the impact of building height and positioning of buildings on:</p> <ul style="list-style-type: none"> <li>• The immediate &amp; surrounding environment - streetscape, historic character;</li> <li>• Adjoining structures;</li> <li>• Open spaces and public realm;</li> <li>• Views and Vistas.</li> </ul> |  |
| CPO 6.19                  | The development of zoned land should generally be phased in accordance with the sequential approach as set out in this chapter. The Council reserves the right to refuse permission for any development that is not consistent with these principles.   | We contend that as development has been permitted and is nearing completion beyond the site and farther from the town centre (i.e. leapfrogging the site to the north-west), it is appropriate for the site to come forward for development at the current time. This wholly accords with the principles of proper and sequential development, and is evident on Figure 7.4 below. |
| CPO 6.20                  | <p>Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.</p> <p>New significant residential or mixed use development proposals (of which residential development forms a component), shall be required to be</p>  | As required by this and other CPOs, a <i>Social Infrastructure Audit</i> and a <i>Accessibility Statement</i> have been prepared in respect of the proposed development. Both are enclosed as part of the Planning Application under separate cover.   |

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
|                           | <p>accompanied by a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.</p> <p>New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:</p> <p>(a) local services including shops, schools, health care and recreational facilities, and<br/>(b) public transport services.</p> <p>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.</p> | <p>The <i>Social Infrastructure Audit</i> confirms the adequacy of social and community infrastructure provision in Blessington. This will be improved by way of the inclusion of the medical centre in the proposed development.</p> <p>The detail in the Audit should be read in conjunction with the response to the matter of childcare raised by the Planning Authority in the <i>LRD Opinion</i>. This is contained in the enclosed <i>Statement of Response to LRD Opinion</i>.</p> <p>The <i>Accessibility Statement</i> confirms that future residents will be able to easily and safely access local services, facilities and amenities via active modes, which will be improved thanks to the proposed pedestrian and cyclist crossings.</p> |
| CPO 6.22                  | In existing residential areas, small scale infill development shall generally be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. However, on large sites or in areas where previously unserved, low density housing becomes served by mains water services, consideration will be given to densities above the prevailing density, subject to adherence to normal siting and design criteria.   | The size of the subject site, with its gross area of 6.05 Ha is capable of successfully defining its own density. However, in terms of its delivery as 51.2 dph it has sought to be respectful of neighbouring heights and scales of development. Height takes cues and positively responds to the context; transitioning from 5 No. storeys opposing the existing mixed-use development to the south-east, down to 3 No., 2 No. and 1 No. storeys.   |
| CPO 6.26                  | While the zoning objectives indicate the different uses permitted in principle in each zone it is important to avoid abrupt transitions in scale and use at the boundary of adjoining land use zones. In   | The proposed mix of uses and scales of development are of importance in respect of this CPO.  |



| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
|                           | these areas it is necessary to avoid developments that would be detrimental to amenity. In zones abutting residential areas, particular attention will be paid to the use, scale, density and appearance of development proposals and to landscaping and screening proposals in order to protect the amenities of residential properties. | <p>In terms of uses, we contend that the proposed residential, medical centre, pharmacy and café uses do not conflict with the existing, established uses on adjacent sites, which are principally residential, childcare, open space, retail and commercial. Therefore, no 'conflict' of uses will arise.</p> <p>In relation to scales of development, it is described throughout this report how the proposal takes cues from and respects neighbouring prevailing heights. Please refer to CPO 6.22 for simple commentary.</p> |
| CPO 6.27                  | To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county, in accordance with the Design Standards for new Apartments, Guidelines for Planning Authorities (2020)         | <p>A variety of housing types and sizes are proposed:</p> <ul style="list-style-type: none"> <li>• Houses, apartments, duplexes;</li> <li>• 1-bed up to 4-bed; and</li> <li>• 'Standard' and 'later living' occupancies.</li> </ul> <p>The mix of unit sizes (number of bedrooms) complies with SPPR<sub>1</sub>, as stated above.</p>  |
| CPO 6.28                  | Apartments generally will only be permitted in settlements Levels 1 to 6 and in accordance with the location requirements set out in Section 2.4 of the Design Standards for New Apartments, Guidelines for Planning Authorities (2020). All apartment development should be served by high quality usable open space.                    | Blessington is a Level 3 settlement, therefore, apartments units are appropriate. All standards have been met or exceeded, as shown in DGA's <i>Housing Quality Assessment</i> and emphasised below.  |
| CPO 6.30                  | The maximum size of any single 'housing estate' shall be 200 units and developments that include more than 200 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes.   | The proposed development is in excess of 200 No. units. Accordingly, it has been broken down into 2 No. distinct 'character areas' (each less than 200 No. units), with variations on materiality, but with complementary design approaches.  |
| CPO 6.32                  | To support independent living and facilitate the provision of supported housing (specific purpose-built accommodation) for older people and people with disabilities towns and  | As LLUs are akin to independent living units, we contend that the development accords with this CPO as it proposes them within the town of Blessington, where residents can   |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           | <p>villages. To facilitate the provision of nursing homes, retirement villages, residential care facilities at appropriate locations in towns and villages in the County. These facilities must be well served by infrastructure and amenities including accessible footpaths, local shops and public transport in order to allow the residents to be socially included and to allow better care in the community, independence and access</p>   | <p>easily access a range of vital services, facilities and amenities.</p>  |
| CPO 6.35                  | <p>In many settlements in the County, there are sites and areas in need of development and renewal, in order to prevent:</p> <ul style="list-style-type: none"> <li>a. adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land,</li> <li>b. urban blight and decay,</li> <li>c. anti-social behaviour, or</li> <li>d. a shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses</li> </ul> <p>It is an objective of this plan to encourage and facilitate the appropriate development of such sites / lands and all available tools and mechanisms, including the Vacant Site Levy, may be utilised to stimulate such development.</p> <p>All lands zoned for residential development in this plan (this refers to Level 4 and 5 settlements), including all lands zoned:</p> <ul style="list-style-type: none"> <li>- Existing Residential (RE),</li> <li>- New Residential (RN), and</li> <li>- Town Centre, outside of the designated 'regeneration zone' as defined in each plan,</li> </ul> <p>are deemed to be lands that may be in need of new development in order to ensure there is no shortage of housing, and these zones will be examined in detail in order to determine if there are sites where the Vacant Site Levy should be applied.</p> | <p>To avoid lengthy duplication, please refer to the response prepared in respect of CPO 5.13 above, which relates to the same matter.</p> |

| Policy / Objective Number        | Policy / Objective  | Comment    |                     |                   |  |                          |                    |                          |  |                                  |   |             |            |  |
|----------------------------------|---|------------|---------------------|-------------------|--|--------------------------|--------------------|--------------------------|--|----------------------------------|---|-------------|------------|--|
|                                  | <p>In addition, the following residential zones in larger towns, are deemed to be lands that may be in need of new development in order to ensure there is no shortage of housing, and these zones will be examined in detail in order to determine if there are sites where the Vacant Site Levy should be applied.</p> <table><tr><th>Settlement</th><th>Zones<sup>14</sup></th></tr><tr><td>Bray and Environs</td><td>RE, R-HD, R20, R15, R10, R, MU (where the predominate use provided for is residential)</td></tr><tr><td>Wicklow Town and Rathnew</td><td>RE, R1, R2, R3, R4</td></tr><tr><td>Arklow Town and Environs</td><td>RE, R28, R20, R10, R, MU (where the predominate use provided for is residential)</td></tr><tr><td>Greystones, Delgany and Kilcoole</td><td>RE, R22, R17, R15, R10, R5, R2.5, R (Special), MU (where the predominate use provided for is residential)</td></tr><tr><td>Blessington</td><td>RE, R1, R2</td></tr></table> | Settlement | Zones <sup>14</sup> | Bray and Environs | RE, R-HD, R20, R15, R10, R, MU (where the predominate use provided for is residential) | Wicklow Town and Rathnew | RE, R1, R2, R3, R4 | Arklow Town and Environs | RE, R28, R20, R10, R, MU (where the predominate use provided for is residential) | Greystones, Delgany and Kilcoole | RE, R22, R17, R15, R10, R5, R2.5, R (Special), MU (where the predominate use provided for is residential) | Blessington | RE, R1, R2 |  |
| Settlement                       | Zones <sup>14</sup>   |            |                     |                   |  |                          |                    |                          |  |                                  |   |             |            |  |
| Bray and Environs                | RE, R-HD, R20, R15, R10, R, MU (where the predominate use provided for is residential)  |            |                     |                   |  |                          |                    |                          |  |                                  |   |             |            |  |
| Wicklow Town and Rathnew         | RE, R1, R2, R3, R4  |            |                     |                   |  |                          |                    |                          |  |                                  |   |             |            |  |
| Arklow Town and Environs         | RE, R28, R20, R10, R, MU (where the predominate use provided for is residential)  |            |                     |                   |  |                          |                    |                          |  |                                  |   |             |            |  |
| Greystones, Delgany and Kilcoole | RE, R22, R17, R15, R10, R5, R2.5, R (Special), MU (where the predominate use provided for is residential)   |            |                     |                   |  |                          |                    |                          |  |                                  |   |             |            |  |
| Blessington                      | RE, R1, R2  |            |                     |                   |  |                          |                    |                          |  |                                  |   |             |            |  |

#### 6.10.4 Chapter 7 – Social & Community Development

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
| CPO 7.5                   | <p>Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.</p> <p>New significant residential or mixed use development proposals (of which residential development forms a component), shall be required to be accompanied by a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.</p> <p>New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other</p> | To avoid lengthy repetition, please refer to the response provided to CPO 6.20 above. |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           | <p>than the private car (a) local services including shops, schools, health care and recreational and sports facilities, and (b) public transport services.</p> <p>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.</p>  |  |
| CPO 7.6                   | To require as part of any Social Infrastructure Audit process that the cumulative effects of similar large scale developments be appropriately factored as part of the audit when determining the capacity of the assessed infrastructure that will be affected by the increase in population. This is to ensure that the compounding effects of any such large scale increase to a local population will be adequately serviced with community infrastructure.  |  |
| CPO 7.8                   | To promote and support Universal Design whereby all environments and facilities can be used to the greatest extent possible by all people, regardless of age, ability or disability.   | The open spaces have been designed with consideration of universal design and as noted in Section 7.7.2 below, 20.4% of all units have been designed in accordance with universal design principles.   |
| CPO 7.19                  | <p>To facilitate the development of healthcare uses at suitable locations, in liaison with the appropriate health authorities. Health facilities will be considered at all locations and in all zones provided that:</p> <ul style="list-style-type: none"> <li>the location is readily accessible to those availing of the service, with a particular presumption for facilities in towns and villages and in areas of significant residential development. Isolated rural locations will not generally be considered except where it can be shown that the nature of the facility is such that demands such a location;</li> <li>the location is generally accessible by means other than</li> </ul> | <p>The development includes a medical centre with 6 No. consultation rooms. It will enhance the community infrastructure provision in the town.</p> <p>The centre is located on TC-zoned lands and will be accessible by foot and cycle, as sought by the CPO. A series of parking spaces are included, which feature accessible parking bays for persons with mobility limitations.</p> |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           | <p>private car, in particular by public transport services, or by walking/cycling; and</p> <ul style="list-style-type: none"> <li>the location is accessible to those with disabilities.</li> </ul>  |  |
| CPO 7.20                  | To facilitate the establishment of new or expansion of existing hospitals, nursing homes, centres of medical excellence, hospices, wellness/holistic health centres, respite care facilities or facilities for those with long term illness.   |  |
| CPO 7.23                  | To facilitate the development and improvement of new and existing supported living facilities throughout the County.   | Although a slightly different housing typology, we are of the opinion that LLUs are akin to these housing types.   |
| CPO 7.24                  | <p>Residential and daycare facilities shall, in general, be required to locate in existing towns or villages where sustainable mobility is easily achieved, shall be located close to shops and other community facilities required by the occupants and shall be easily accessible to visitors, staff and servicing traffic. Locations outside of delineated settlement boundaries shall only be considered where:</p> <ul style="list-style-type: none"> <li>The site is located in close proximity to a settlement and would not comprise an isolated development;</li> <li>An alternative site within the settlement boundary is not available;</li> <li>There are excellent existing or potential to provide new vehicular and pedestrian linkages to settlement services; and</li> <li>The design and scale of the facility is reflective of the semi-rural location.</li> </ul> | <p>We assert that they provide an appropriate transitional housing type between wholly independent dwellings through to nursing home care.</p> <p>As CPO 7.24 presents, the location for these housing types should be in an established town location – like the subject site – where residents can avail of pre-existing services and amenities, thus ensuring that they are not isolated in remote rural locations.</p> |
| CPO 7.29                  | Where considered necessary by the Planning Authority, to require the provision of childcare facilities in all residential developments comprising 75 houses or more (including local authority and social housing schemes). In accordance with Department of Environment, Heritage & Local   | As presented in the <i>Social Infrastructure Audit</i> , the settlement of Blessington has an adequate and improving supply of childcare facilities. Based on the unit mix of the development, the demographic composition of the town and childcare enrolment rates, we   |



| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
|                           | Government guidelines, childcare places shall be provided at a ratio of 20 places per 75 residential units, having regard to cumulative effects of permitted development, (unless it can be demonstrated that having regard to the existing geographic distribution of childcare facilities and the emerging demographic profile of the area that this level of childcare facilities is not required). Without substantial cause, it is the policy of the Planning Authority not to allow a change of use of these premises within five years. | <p>estimate a demand of just 11 No. childcare spaces from the proposal.</p> <p>As we present in the Audit and in response to the childcare matter noted in the <i>LRD Opinion</i> (see the <i>Statement of Response to LRD Opinion</i> for same), we are of the understanding and opinion that the existing and under construction childcare facilities have adequate capacity to cater for the proposed development.</p> |
| CPO 7.31                  | Support the objectives of public health policy including Healthy Ireland, National Sports Policy and the National Physical Activity Plan.  | <p>The development includes a children's play area at its very centre. This will encourage physical activity and promote social interaction and integration.</p>  |
| CPO 7.32                  | To facilitate opportunities for play and support the implementation of the Wicklow County Council Play Policy and its objectives, including the collection of development levies.  |   |
| CPO 7.33                  | In all new residential development in excess of 50 units, where considered necessary by the Planning Authority, the developer shall provide, in the residential public open space area, a dedicated children's play area, of a type and with such features to be determined following consultation with Community, Cultural & Social Development Office of Wicklow County Council. The location of any such proposal shall be situated within a centrally located area capable of being passively supervised by surrounding developments.      |   |
| CPO 7.34                  | All new estates, streets, open spaces/parks and community facilities shall be designed with the needs and safety of children, the elderly and people with disabilities as a priority.  | <p>The proposed open spaces include features to meet the preferences and needs of different age groups and sectors of society: play space, seating, walking routes, etc.</p> <p>The design of the spaces have also been prepared in accordance with universal design principles, to maximise their accessibility and usability.</p>   |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 7.35                  | Subject to safety considerations, natural features (trees, streams etc) shall be retained in new developments.   | It is proposed to retain the northern hedgerow and watercourse given their aesthetic, ecological and heritage values.  |
| CPO 7.46                  | To require open space to be provided in tandem with new residential development (in accordance with the standards set out in the Development & Design Standards Appendix).   | Per DGA's <i>Phasing Strategy</i> drawing, all public open spaces and communal amenity spaces will be delivered in the first phase of development.   |
| CPO 7.49                  | To require proposals for open space to include in their layout and overall design that will enhance and create greater biodiversity, in accordance with the objectives of Chapter 17 and 18 of this plan and the standards set out in the Development & Design Appendix. | The proposed landscape plan prepared by Ilsa Rutgers Landscape Architecture will result in a marked improvement of ecological/biodiversity on-site. Currently, the site is an idle, former agricultural field. Upon completion of the development, it will yield a broad range of tree, hedge and shrub species. We are of the opinion that despite the loss of grassland, these features have the potential to become far more ecologically valuable and important. |
| CPO 7.51                  | All open spaces shall be provided with environmentally friendly lighting in order to ensure their safe usage after daylight hours, in accordance with Chapter 15 of this plan 'Light Pollution' and the standards set out in the Development & Design Appendix.          | Details of the proposed lighting are provided in the materials prepared by Sabre. Lighting has been reviewed by the Landscape Architect and guidance provided by the Ecologist. LED fittings are proposed, given they are more ecologically/environmentally appropriate.   |

#### 6.10.5 Chapter 8 – Built Heritage

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
| CPO 8.1                   | To secure the preservation of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally. In the development management process, there will be a presumption of favour of preservation in-situ or, as a minimum, preservation by | <p>With respect to archaeology, we note the identification of 3 No. features at the subject site per the National Monuments Service's 'Historic Environment Viewer': a 'barrow', a 'landscape feature' and a 'habitation site'.</p> <p>An <i>Archaeological Assessment</i> has been prepared by IAC Archaeology and is enclosed for full review under</p> |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | record. In securing such preservation, the Planning Authority will have regard to the advice and recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage  | separate cover. However, we have extracted key conclusions in Section 7.11 below.<br><br>It is intended to retain the barrow feature <i>in situ</i> , respectfully incorporating same into the landscape proposal. |
| CPO 8.2                   | No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) or any other site of archaeological interest will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.  | As stated in IAC's report, there was <i>"no visible evidence of the designated landscape feature nor the habitation site"</i> .  |
| CPO 8.3                   | Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedules 08.01 & 08.02 and Maps 8.01 & 8.02 of this plan) shall be subject to an archaeological assessment.                     | The landscape plan includes a proposal to provide information boards at the barrow feature to be preserved, creating a direct connection for residents with the past.  |
| CPO 8.5                   | To facilitate new or improved public access to and erection of appropriate interpretive signage at National Monuments, archaeological sites, castles, sites of historic interest and archaeological landscapes in State or private ownership, as identified in Schedule 08.02 and Map 8.02 of this plan, in co-operation with landowners. |  |
| CPO 8.10                  | To protect, conserve and manage the built heritage of Wicklow and to encourage sensitive and sustainable development to ensure its preservation for future generations.   |  |
| CPO 8.26                  | To facilitate access to and appreciation of areas of historical and cultural heritage, through the development of appropriate trails and heritage interpretation, in association with local stakeholders and site landowners, having regard to the public safety issues associated with such sites.                                       |  |

## 6.10.6 Chapter 9 – Economic Development

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 9.1                   | To support all forms of employment creation, especially where this can mitigate long distance commuting, subject to the proper planning and sustainable development of the area and compliance with all other objectives of this plan. Strategic employment development will be directed into the towns of Bray, Wicklow-Rathnew, Arklow, Greystones and Blessington.  | The proposed development's medical centre, café and pharmacy will all create employment opportunities within the centre of Blessington.      |
| CPO 9.3                   | To normally require new employment generating developments to locate on suitably zoned or identified land in settlements. Proposals in settlements with no zoning plan should be assessed on the basis of their individual merits, taking into consideration the objectives set out in this chapter of the plan and all other matters pertaining to the proper planning and sustainable development of the area, including ensuring that the proposal is appropriately sited in a location so that it enhances, complements, is ancillary to or neutral to the existing land uses in the area. All other proposals for employment generating developments outside of settlements will be assessed on the 'Objectives for Wicklow's Rural Economy'.   | The location of these uses is zoned town centre, thus making them the appropriate location for same.   |
| CPO 9.20                  | To encourage and facilitate the provision of office developments and small-scale service industries at appropriate locations. The most suitable location for local or small-scale office developments and small-scale service industries is generally in above-ground floor commercial premises at appropriate locations in town / village centres and neighbourhood centres <sup>11</sup> . The development of these types of uses in neighbourhood centres can reinforce the existing service function of these centres, as well as create new opportunities for local employment in locations that are accessible to residential areas. The Council will permit office development in appropriate employment zoned locations that are deemed suitable with regard to sustainable traffic and land use considerations. |  |
| CPO 9.5                   | To permit proposals for employment generating development where it can be demonstrated that the development complies with the relevant development standards and is not detrimental to residential amenity or to environmental quality, and is acceptable with regard to its impact on the   | The proposed employment generating uses will complement the existing and proposed residential uses. They have been intentionally selected to |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | character and visual amenity of the area. Regard will be paid to ensuring that existing or planned infrastructure can acceptably accommodate a proposed development. Developments that result in a high level of traffic generation that cannot be accommodated by the local road network in the vicinity, that are detrimental to residential amenity, the character or visual amenity of an area or to existing service infrastructure will not be permitted.   | avoid land-use and operational conflicts.<br><br>Their design will not impact amenity given prevailing patterns and styles of development, whilst their scale is restrained such that they will not result in traffic hazard or large numbers of vehicular movements. In fact, the site's centrality lends itself to the use of active modes of transport. |
| CPO 9.6                   | To promote the development of employment generating uses at locations which comply with sustainable transportation objectives i.e. <ul style="list-style-type: none"> <li>• promoting the development of 'product' intensive industries (typically manufacturing and logistics based uses) at locations that are accessible to strategic roads infrastructure;</li> <li>• promoting the development of 'people' intensive industries (typically office, services and startup entrepreneur based uses) at locations that are accessible by public transport networks and substantial residential areas, served by cycle networks and walking routes;</li> <li>• promoting the intensification of existing employment land uses that are in proximity to good public transport facilities; and</li> <li>• where appropriate, promoting the integration of employment uses with other land uses, including residential, tourism and retail uses, in an effort to provide mixed use developments, which can reduce the need to travel.</li> </ul> | The site's proximity to bus stops will also encourage the use of sustainable public transport.   |
| CPO 9.14                  | To require employment based developments to be of the highest standard of architectural design and layout and comply with the Development & Design Standards set out in this plan.  |  |

#### 6.10.7 Chapter 10 – Retail

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 10.1                  | To ensure the continued vibrancy and vitality of town and village centres, to direct new development and investment into towns and villages in the first | The non-residential uses will support the vibrancy of the site and town core, whilst complementing the |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | instance and to particularly prioritise actions that enhance business, retail, leisure, entertainment and cultural uses, as well as making town and villages centres an attractive place to live.   | proposed and existing residential uses.  |
| CPO 10.2                  | To facilitate measures to improve the accessibility of centres by developing a pedestrian and cyclist friendly environment, which improves safety and limits traffic congestion where possible. It is the objective of the Council to promote accessibility to public transport. Development with a high potential for public transport utilisation by employees and visitors should be sited with ease of access to public transport facilities. | The proposed development includes a series of pedestrian and cyclist infrastructure improvements, including several crossings and a 3 metre wide path through the development, linking from north-west to south-east.  |
| CPO 10.3                  | Support the vitality and viability of existing town and village centres and facilitate a competitive and healthy retail environment by ensuring that future growth in retail floorspace responds to the identified retail hierarchy and the guidance set out in the Retail Planning Guidelines for Planning Authorities (DoECLG, 2012).   | Whilst a mix of uses are proposed, the only retail space is the proposed pharmacy. This modest retail unit is sited on the TC-zoned within the town centre itself and will complement the medical centre and LLUs.   |
| CPO 10.4                  | To promote and facilitate the development of retail in a sustainable manner. Retail related development shall be located on suitably zoned land within settlement boundaries. There shall be a general presumption against the development of retail uses within the rural area, except as otherwise provided for by a particular objective of this plan  | Its scale and offering will provide an appropriate level of competition within the town, but will not act to undermine or detract from its attractiveness of viability.<br><br>Ultimately, we contend that the core retail area will remain as such and that the scale of the pharmacy unit will respect this pattern of development and concentration of activity, despite it being proposed on TC-zoned lands. |
| CPO 10.5                  | To assess all planning applications having regard to the 'Retail Planning Guidelines for Planning Authorities' and Retail Design Manual (DoECLG 2012) unless otherwise stated herewith.   |  |
| CPO 10.6                  | To permit the nature and scale of retail development appropriate to enable each centre to perform its role and function as defined within the County Retail Strategy. The nature and scale of a development proposed (either by themselves or cumulatively in conjunction with other developments)  |  |



| Policy / Objective Number | Policy / Objective   | Comment |
|---------------------------|--|---------|
|                           | in a centre shall not compromise the role or function of any other centre within the hierarchy, in particular the role and function of a centre that is of a higher level in the hierarchy above that which is being considered.   |         |
| CPO 10.8                  | To vigorously protect and promote the vitality and viability of town centres. Development proposals not according with the fundamental objective to support the vitality and viability of town centre sites must demonstrate compliance with the 'sequential approach' before they can be approved. The 'sequential approach' shall be applied and assessed in accordance with the 'Retail Planning Guidelines, (DoECLG, 2012)' <sup>4</sup> . The Planning Authority will discourage new retail development if they would either by themselves or cumulatively in conjunction with other developments seriously damage the vitality and viability of existing retail centres within the County. In the application of the 'sequential approach' due regard shall be paid to CPO 10.9 below which prioritises the 'core retail area' for new retail development. |         |
| CPO 10.9                  | To promote developments which reinforce the role and function of the 'core retail area' as the prime shopping area of town centres. The 'core retail area' shall be promoted as the area of first priority for new retail development. Where an application is made for a new development with street frontage within the defined retail core area of a town centre, retail or commercial use will normally be required at street level. In settlements where no 'core retail area' is defined, new retail development shall be directed into the 'town or village centre' area, the location of the traditional/historical centre and the location of other retail units. Outside of the 'core retail area' of larger settlements and in smaller settlements where no 'core retail area' is defined,  |         |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | other uses including residential will be permitted including at street level; any such development should provide a strong street frontage and respect the traditional structure of town and village centres.   |  |
| CPO 10.25                 | <p>Small scale retail development appropriate to the scale and needs of the settlement and its catchment will be positively considered subject to the following control criteria:</p> <ul style="list-style-type: none"> <li>• there shall be a clear presumption in favour of central or edge of centre locations for new development, i.e. the traditional historical centre;</li> <li>• out of centre locations will not be considered suitable for new retail;</li> </ul> <p>new development shall be designed with the utmost regard to the historical pattern of development in the centre and the prevailing character, with particular regard to building form, height and materials and shall generally be required to incorporate a traditional shop front.</p> |  |
| CPO 10.10                 | New retail developments in town centres will be required to provide proximate and easily accessible car and cycle parking or to make a financial contribution towards car parking where it has been or will be provided by the Local Authority. Large scale retail developments should include a Mobility Management Plans which prioritise sustainable mobility options and inform the layout of the development to create a pedestrian and cyclist friendly urban environment.  | Car and cycle parking for the pharmacy are proposed immediately adjacent to the unit. Given its centrality within Blessington, it is not expected that it will generate substantial vehicle demands. A synergy will be created with the also proposed medical centre.  |
| CPO 10.12                 | To manage the provision of non retail uses at ground floor level within the retail core area of town centres in order to protect the retail viability of centres and to maintain the visual character of streets. This objective aims to prevent the proliferation of 'dead frontages' on key streets. In particular, active use of corner sites, particularly within larger  | The TC-zoned portion of the site is slightly removed from the main retail core and distanced due to the presence of the 5-storey Dunnes Stores / mixed-use development. Therefore, the range of potentially viable uses is limited in nature. Consequently, whilst the pharmacy retail unit is proposed, the inclusion |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | centres, is considered pivotal in creating a sense of vibrancy.   | of the café and medical centre were deemed appropriate.  |
| CPO 10.16                 | To promote quality design in all retail development, in accordance with the design principles set out in the Retail Planning Guidelines 2012 and companion document 'Retail Design Manual' (DoAHG, 2012), including the guidance set out in the 'Development and Design Standards' appended to this plan. | A high-quality architecture-led design of the retail and other non-residential uses has been pursued. A strong street presence is proposed to activate key southern frontages, with quality brick materials proposed in this part of the scheme. |
| CPO 10.19                 | To promote quality design and materials in the development of shopfronts.   |  |

#### 6.10.8 Chapter 12 – Sustainable Transportation

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
| CPO 12.2                  | Through sustainable planning and investment in transport infrastructure, including roads and public transport systems, to reduce journey times, length, congestion and to increase the attractiveness of public transport.  | The proposed development is in a well-connected and centrally located site proximate to a range of services and amenities and public transport options. Therefore, active and public modes of transport can be availed of, thereby reducing congestion and journey times, etc. |
| CPO 12.4                  | All planning applications for large employment based developments and/or trip intensive developments, where the Planning Authority considers that a significant peak and/or off peak travel will be generated, are required to include a Mobility Management Plan.  | Please refer to the <i>Mobility Management Plan</i> prepared by DBFL and submitted under separate cover.   |
| CPO 12.5                  | New significant residential or mixed use development proposals <sup>5</sup> shall be required to be accompanied by an 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car (a) local services including shops, schools, health care and recreational facilities, and (b) public transport services. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in | Please refer to the <i>Accessibility Statement</i> prepared by DBFL and submitted under separate cover.  |

| Policy / Objective Number                               | Policy / Objective  | Comment  |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
|---|---|--|--|-------------|---|--|--|-----------------------------------|--|---|--|--|--|--|---|--|--|---|--|--|--|--|--|
|   | accordance with the capacity/quality of existing or planned linkages.   |  |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
| CPO 12.7  | To facilitate the development of services and utilities for electric vehicles and alternative fuel vehicles types, including the roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations.  | The development incorporates EV charging infrastructure, as comprehensively set out in the enclosed <i>Electric Vehicle Charging Strategy</i> .      |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
| CPO 12.8  | <div><div>To require the implementation of the following standards for EV charging in new developments:</div><table><thead><tr><th colspan="2">Building type</th><th>Requirement</th></tr></thead><tbody><tr><td rowspan="2">New buildings and buildings undergoing major renovation</td><td>Non-residential buildings with more than 10 parking spaces within property boundary.</td><td>Installation of at least 1 recharging point.</td></tr><tr><td>Residential multi-unit buildings.</td><td>Installation of ducting infrastructure for at least 1 in 5 parking spaces.</td></tr><tr><td rowspan="2">New (single-unit residential) buildings</td><td></td><td>Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces)</td></tr><tr><td></td><td>Installation of ducting infrastructure for every parking space within property boundary.</td></tr><tr><td rowspan="2">New (single-unit residential) buildings</td><td>New 'own door' dwelling with car parking space located within the property boundary.</td><td>Installation of recharging points for electric vehicles on site.</td></tr><tr><td>New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.</td><td>Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents.</td></tr><tr><td></td><td></td><td>Installation of ducting infrastructure for every parking space within development.</td></tr></tbody></table></div> | Building type  |  | Requirement | New buildings and buildings undergoing major renovation | Non-residential buildings with more than 10 parking spaces within property boundary. | Installation of at least 1 recharging point. | Residential multi-unit buildings. | Installation of ducting infrastructure for at least 1 in 5 parking spaces. | New (single-unit residential) buildings |  | Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) |  | Installation of ducting infrastructure for every parking space within property boundary. | New (single-unit residential) buildings | New 'own door' dwelling with car parking space located within the property boundary. | Installation of recharging points for electric vehicles on site. | New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries. | Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents. |  |  | Installation of ducting infrastructure for every parking space within development. | <p>Overall car parking is provided in accordance with CPO 12.56 and its associated standards for non-residential uses. However, as car parking for residential uses is now guided by SPPR 3 of the Compact Growth Guidelines, compliance with same is proposed.</p> <p>Please refer to Section 7.7 below for full details.</p> |
| Building type   |   | Requirement  |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
| New buildings and buildings undergoing major renovation | Non-residential buildings with more than 10 parking spaces within property boundary.  | Installation of at least 1 recharging point.   |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
|   | Residential multi-unit buildings.   | Installation of ducting infrastructure for at least 1 in 5 parking spaces.   |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
| New (single-unit residential) buildings                 |   | Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces)                               |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
|   |   | Installation of ducting infrastructure for every parking space within property boundary.   |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
| New (single-unit residential) buildings                 | New 'own door' dwelling with car parking space located within the property boundary.  | Installation of recharging points for electric vehicles on site.   |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
|   | New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.   | Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents. |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
|   |   | Installation of ducting infrastructure for every parking space within development.   |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |
| CPO 12.56   | <p>New / expanded developments shall be accompanied by appropriate car parking provision, including provision for electric vehicle charging points as set out in Objective CPO 12.8, with particular regard being taken of the potential to reduce private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Appendix 1 Table 2.3 shall be taken as <b>maximum standards</b>, and such a quantum of car parking will only be permitted where it can be justified.</p> <p>In locations where public transport and parking enforcement are not available, the car parking standards set out in Appendix 1 Table 2.3 shall be taken as <b>minimum standard</b> in order to ensure that haphazard unregulated car parking does not occur in the vicinity of the development. Deviations from this table may be considered in multi-functional developments (e.g. hotels, district centres), where the developer provides a robust model of car parking usage to show that dual usage will occur and that peak car parking demand at any time of the day / week will always be met or other situations that may be considered on a case-by-case basis.</p> <p>In situations where a developer cannot meet the necessary car parking requirement on or near the development site, the developer may request the Local Authority to accept a special payment in lieu, to</p>  |  |  |             |   |  |  |                                   |  |   |  |  |  |  |   |  |  |   |  |  |  |  |  |

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
|                           | be utilised by the Local Authority in providing car parking in the area.  |   |
| CPO 12.12                 | To require all new or improved roads to include pedestrian facilities, cycle lanes / tracks (unless the scale / design of the road does not warrant such infrastructure having regard to the guidance set out in the National Cycle Manual and DMURS) and public lighting as deemed appropriate by the Local Authority  | Cycle parking in accordance with the Development Plan and relevant Section 28 Guidelines is proposed, as detailed in Section 7.8.2 below. It is appropriately designed, covered and accessed, benefitting from ample passive surveillance in all instances.   |
| CPO 12.13                 | To facilitate the development of pedestrian and cycle linkages through and between new and existing developments to improve permeability and provide shorter, more direct routes to schools, public transport, local services and amenities while ensuring that personal safety, particularly at night time, is of the utmost priority                              |   |
| CPO 12.14                 | To facilitate the implementation of local projects which support pedestrian and cyclist permeability, safety and access to schools and public transport   |   |
| CPO 12.17                 | To encourage the provision of secure covered bicycle parking facilities at strategic locations such as town centres, neighbourhood centres, community facilities and transport nodes; and to support and encourage the provision of changing facilities at destinations   | In terms of proposed networks, the development includes a series of safe and accessible routes which integrate with the pedestrian and cyclist infrastructure surrounding the site.   |
| CPO 12.33                 | To require all new or improved roads (of all designations) to include pedestrian facilities, cycle lanes / tracks (unless the scale / design of the road does not warrant such infrastructure (having regard to the guidance set out in the National Cycle Manual and DMURS), public lighting and bus stop facilities as deemed appropriate by the Local Authority. | <p>Of note are:</p> <ul style="list-style-type: none"> <li>• A 3 metre wide pedestrian and cyclist route through the development, connecting the Blessington Inner Relief Road to the north-west with the link street to the south-east.</li> <li>• New crossings at the Blessington Inner Relief Road to the west.</li> <li>• New crossing at the Blessington Inner Relief Road towards</li> </ul> |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           |  | <p>Sorrel Wood to the north-west.</p> <ul style="list-style-type: none"> <li>New crossing at Cocoon</li> </ul> <p>Childcare to the south-east.</p>   |
| CPO 12.30                 | Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG) and the 'Traffic & Transport Assessment Guidelines' (TII).  | A <i>Stage 1&amp;2 Road Safety Audit</i> , <i>Accessibility Statement</i> , <i>DMURS Design Statement</i> , <i>Traffic and Transport Assessment</i> and <i>Mobility Management Plan</i> have been prepared as part of this Planning Application.                 |
| CPO 12.31                 | Road Safety Audits, Road Safety Impact Assessments, Street Design Audits as per DMURS, or Accessibility Audits shall be required at the discretion of the Planning Authority, but shall generally be required where new road construction or a permanent change to the existing road / street layout is proposed.  | Traffic impact is assessed in the <i>Traffic and Transport Assessment</i> document.  |
| CPO 12.34                 | The design of new roads or improvements to existing local roads and new means of access onto roads shall generally comply with the guidance set out in the 'Design Manual for Roads & Bridges' DMRB (TII), the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG), the 'Traffic Management Guidelines' (DoT-DoELG-DTO) and 'Recommendations for Site Development Works for Housing Areas' (DoELG) as appropriate. as may be amended and revised, unless local conditions determine otherwise.  | Please refer to the <i>DMURS Design Statement</i> and suite of drawings prepared by DBFL for details compliance with the <i>Design Manual for Urban Roads and Streets</i> .  |
| CPO 12.42                 | To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts. | The protection of carrying capacity of road infrastructure is considered in DBFL's <i>Traffic and Transport Assessment</i> . The Council is directed to same for full details in the technical assessment relating to the Blessington Inner Relief Road and N81. |
| CPO 12.44                 | To support and drive the development and completion of the Blessington Inner Relief Road (in consultation with Kildare County Council) and upon completion, to significantly improve pedestrian and cycling  | While the proposed development delivers an internal road network in accordance   |



| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | infrastructure on Blessington Main Street and surrounding town centre local road network  | with the <i>Design Manual for Urban Roads and Streets</i> and the <i>Cycle Design Manual</i> , it has also sought to improve the surrounding road network. Evidence of this are the pedestrian and cyclist crossings at the Blessington Inner Relief Road roundabout to the west, at the Blessington Inner Relief Road to the north-west and at the link street beside Cocoon Childcare to the south-east. |
| CPO 12.49                 | To continue to improve local roads to the appropriate standards (given the location), with particular cognisance to safety improvements for pedestrians and cyclists, consistent with predicted traffic flow and in accordance with Government policy and the Roads Programme adopted by the Council. |  |
| CPO 12.50                 | To provide new and improve existing roads in urban areas in accordance with objectives identified in local area, town and settlement plans.   |  |
| CPO 12.51                 | To require all new or improved urban roads to make provision for pedestrian facilities, cycling lanes / tracks, public lighting and bus stop facilities, as deemed appropriate by the Local Authority.  |  |
| CPO 12.57                 | Provision shall be made in all new / expanded developments for Age Friendly and Disabled parking (and associated facilities such as signage, dished kerbs etc) at a suitable and convenient location for users  | As required by the Development Plan, 4% of communal, non-curtilage parking spaces are dedicated accessible parking bays.   |

#### 6.10.9 Chapter 13 – Water Services

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
| CPO13.1                   | To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive | <p>The proposed development incorporates SuDS measures to address surface water, improving its quality and managing its discharge rates, while foul water will be directed to a wastewater treatment plant.</p> <p>We direct the reader to DBFL's <i>Infrastructure Design Report</i> and the ecological and environmental reporting of both Openfield and JBA.</p> |

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
| CPO13.2                   | To prevent development that would pollute water bodies and in particular, to regulate the installation of effluent storage and disposal systems in the vicinity of natural water bodies or development that would exacerbate existing underlying water contamination.  |   |
| CPO13.4                   | To ensure that any development or activity with the potential to impact on ground water has regard to the GSI Groundwater Protection Scheme (see Map 17.06 Groundwater Vulnerability).   |   |
| CPO13.3                   | To minimise alterations or interference with river / stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 25m along watercourses should be provided (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. | <p>The proposal will discharge to the watercourse to the north. Within 20 metres of the same, only a footpath and SuDS are proposed. The closest dwelling is 20 metres away.</p> <p>Please refer to the response provided in relation to CPO 17.26 below.</p> |
| CPO 13.10                 | To require new developments to connect to public water supplies where services are adequate or where they will be provided in the near future, or where extension of an adjacent water supply system is technically and environmentally feasible.  | The proposal intends to connect to public water supplies.   |
| CPO 13.14                 | <p>To require all new developments to integrate water demand reduction designs and technologies in all aspects of the development including but not limited to:</p> <ul style="list-style-type: none"> <li>• Installation of water efficient equipment;</li> <li>• Provision of dual flush toilets, cistern bags or other similar technologies;</li> <li>• Construction of grey water systems to allow for the re-use</li> </ul>   | These considerations are generally standard practice now and are incorporated into the development at detailed design.  |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | <p>of wastewater from sinks, shower drains or washing machines;</p> <ul style="list-style-type: none"> <li>• Provision of rainwater harvesting equipment;</li> <li>• The use of low maintenance plants in the design of landscaping;</li> <li>• In manufacturing, use of process or cooling loops, counter current rinsing and batch processing, or increasing the recycle rate of cooling towers.</li> </ul> |  |
| CPO 13.20                 | Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks.  | The proposed development will separate foul and surface water discharges.  |
| CPO 13.21                 | Ensure the implementation of Sustainable Urban Drainage Systems (SuDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.                               | <p>SuDS are proposed as part of the surface water strategy, as indicated in DBFL's <i>Infrastructure Design Report</i> and accompanying drawings. Features include the following:</p> <ul style="list-style-type: none"> <li>• Swales (nature-based / green infrastructure),</li> <li>• Tree pits (nature-based / green infrastructure),</li> <li>• Biorientation / rain gardens (nature-based / green infrastructure),</li> <li>• Permeable parking bays, and</li> <li>• Fuel/oil separator.</li> </ul> |
| CPO 13.22                 | To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.   | <p>The 4 No. pillars of SuDS design have been considered and incorporated, per the detail in Section 3.2.2 of the <i>Infrastructure Design Report</i>.</p>   |

#### 6.10.10 Chapter 14 – Flood Risk Management

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 14.06                 | To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).                 | A <i>Site-Specific Flood Risk Assessment</i> has been prepared by DBFL in accordance with the 2009 Guidelines. Whilst it is available for review as part of the Planning |
| CPO 14.09                 | Applications for new developments or significant alterations/extension to existing developments in an area at risk |  |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           | <p><b>of flooding</b> shall comply with the following:</p> <ul style="list-style-type: none"> <li>Follow the 'sequential approach' as set out in the Flood Risk Management Guidelines.</li> <li>An appropriately detailed flood risk / drainage impact assessment will be required with all planning applications, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site), taking into account all sources of flooding.</li> <li>Restrict the types of development permitted in Flood Zone A and Flood Zone B to that which are 'appropriate' to each flood zone, as set out in Tables 3.1 and 3.2 of the Flood Risk Management Guidelines unless the 'plan making justification test' has been applied and passed.</li> <li>Where a site has been subject to and satisfied the 'Plan Making Justification Test' development will only be permitted where a proposal complies with the 'Justification Test for Development Management', as set out in Box 5.1 of the Guidelines.</li> <li>Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines and the SFRA.</li> </ul> <p>Where flood zone mapping does not indicate a risk of flooding but the Planning Authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment will be required to be submitted by an applicant for planning permission and the sequential approach shall be applied as the 'Plan Making Justification Test' will not be satisfied.</p> | <p>Application materials, we have extracted its conclusion:</p> <p><i>"The Site-Specific Flood Risk Assessment for the proposed development in Blessington was undertaken in accordance with the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and its Technical Appendices.</i></p> <p><i>Following the Flood Risk Assessment, it has been determined that all developable land within the site is located in Flood Zone C as defined by the Guidelines.</i></p> <p><i>The area where flood Zone A encroachment on the site is not proposed for development and therefore does not affect the classification of the portion of the site which is being developed.</i></p> <p><i>It is concluded that the;</i></p> <ul style="list-style-type: none"> <li><i>Proposed development is appropriate for the site's flood zone category.</i></li> <li><i>The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.</i></li> </ul> <p><i>In conclusion, the proposed development is considered to have the required level of flood protection."</i></p> |

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
| CPO 14.10                 | To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters except where the development can clearly be justified with the Flood Risk Management Guidelines 'Justification Test'.   | The development will not displace the natural attenuation capacity of the watercourse to the north.   |
| CPO 14.11                 | To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.  | Large areas of hard standing/surfacing have been intentionally avoided in the design of the proposed development. Discharge has been reduced to greenfield runoff rates.  |
| CPO 14.12                 | Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.   |   |
| CPO 14.13                 | Ensure the implementation of Sustainable Urban Drainage Systems (SuDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity. | <p>SuDS are proposed as part of the surface water strategy, as indicated in DBFL's <i>Infrastructure Design Report</i> and accompanying drawings. Features include the following:</p> <ul style="list-style-type: none"> <li>• Swales (nature-based / green infrastructure),</li> <li>• Tree pits (nature-based / green infrastructure),</li> <li>• Biorientation / rain gardens (nature-based / green infrastructure),</li> <li>• Permeable parking bays, and</li> <li>• Fuel/oil separator.</li> </ul> <p>The 4 No. pillars of SuDS design have been considered and incorporated, per the detail in Section 3.2.2 of the <i>Infrastructure Design Report</i>.</p> |
| CPO 14.14                 | Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.  |   |
| CPO 14.15                 | To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.   |   |
| CPO 14.16                 | For developments adjacent to all watercourses or where it is necessary to maintain the ecological or  | The development has sought to create a 20 metre buffer from the watercourse to the north, with no   |

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           | environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse in accordance with the guidelines in 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland. | building closer than that distance. The only works closer are a footpath and SuDS features, which we contend complement the amenity, biodiversity and green infrastructure value of the watercourse. |

#### 6.10.11 Chapter 15 – Waste & Environmental Emissions

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 15.1                  | To require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g. one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan to minimise waste generation and the plan to protect the environment with the safe and efficient disposal of waste from the site. | A <i>Construction and Environmental Management Plan</i> has been prepared by DBFL and is available for review under separate cover.<br><br>Also prepared is a <i>Resource &amp; Construction Waste Management Plan</i> prepared by Byrne Environmental, which addresses waste arising during the construction stage. |
| CPO 15.2                  | To require all new developments, whether residential, community, agricultural or commercial to make provision for storage and recycling facilities (in accordance with the standards set out in Development & Design Standards of this plan).  | Details of the proposed waste storage spaces are present in the suite of drawings prepared by DGA and within the <i>Operational Waste Management Plan</i> prepared by Byrne Environmental, which sets out the waste management of the development once it is occupied and operational.                               |
| CPO 15.10                 | To require proposals for new developments with the potential for the accidental release of chemicals or dust generation, to submit and have approved by the Local Authority construction and/or operation management plans to control such emissions.  | Dust generation during the construction stage is addressed in the <i>Construction and Environmental Management Plan</i> , with appropriate mitigation detailed in respect of same.   |
| CPO 15.12                 | To implement the Wicklow County Council Noise Action Plan 2018-2023 (and any subsequent Plan) in order to avoid, prevent and reduce the harmful effects, including annoyance, due to environmental noise exposure  | Noise generation during the construction stage is addressed in the <i>Construction and Environmental Management Plan</i> , with appropriate mitigation and limits detailed in respect of same.   |



| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
| CPO 15.13                 | To enforce, where applicable, the provisions of the Environmental Protection Agency (EPA) Acts 1992 and 2003, and EPA Noise Regulations 2006   | Given the proposed residential, medical centre, pharmacy and café uses, it is not anticipated that the proposed development will result in excessive noise generation or disturbance once operational.  |
| CPO 15.14                 | To regulate and control activities likely to give rise to excessive noise (other than those activities which are regulated by the EPA).  |   |
| CPO 15.15                 | To require proposals for new developments with the potential to create excessive noise to prepare a construction and/or operation management plans to control such emissions.  |   |
| CPO 15.16                 | To require activities likely to give rise to excessive noise to install noise mitigation measures to undertake noise monitoring and to provide an annual monitoring audit.   |   |
| CPO 15.17                 | To ensure that all external lighting whether free standing or attached to a building shall be designed and constructed so as not to cause excessive light spillage, glare, or dazzle motorists, and thereby limiting light pollution into the surrounding environment and protecting the amenities of nearby properties, traffic and wildlife. | <p>The design of the public lighting has been co-ordinated with the lighting designer, ecologist and landscape architect to avoid conflicts and detrimental impacts.</p> <p>Lighting is appropriate and avoids excessive illuminance of the development.</p> <p>LED light fittings are proposed given their efficiencies, long life and ecological appropriateness.</p> |
| CPO 15.18                 | To require proposals for new developments with the potential to create light pollution or light impacts on adjacent residences to mitigate impacts, in accordance with the Development & Design Standards set out in this plan.  |   |
| CPO 15.19                 | To promote the use of low energy LED (or equivalent) lighting.   |   |
| CPO 15.20                 | To require the design and implementation of a hierarchy of light intensity zones in development schemes to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors.   |   |

## 6.10.12 Chapter 16 – Energy Infrastructure & Communications

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 16.01                 | To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel.  | The proposal is to be a highly sustainable and energy efficient scheme. As stated in the <i>Energy Efficiency and Climate Change Adaptation Design Statement</i> prepared by Waterman Moylan, it is potentially possible to achieve A1 rated dwellings.<br><br>PV panels are proposed atop the dwellings and mixed-use block, supporting the generation of renewable energy. Their position, on structures within an existing built-up area, is considered to be appropriate |
| CPO 16.02                 | To support and facilitate the co-location of renewable energy developments and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation.   |  |
| CPO 16.03                 | To support and promote the development of 'Sustainable Energy Communities' and in particular to encourage and facilitate developments that are energy neutral / low emission, integrate renewable energy technology or involve local renewable energy production.      |  |
| CPO 16.08                 | To facilitate and support the development of solar generated electricity.  |  |
| CPO 16.09                 | To positively consider all applications for the installation of building mounted PV cells at all locations, having due regard to architectural amenity and heritage.   |  |
| CPO 16.15                 | To facilitate and support the development of small-scale electricity generation installations.   | This has been the approach to the design of the proposed development. Please review the enclosed <i>Energy Efficiency and Climate Change Adaptation Design Statement</i> for further details. This report details compliance with Part L.  |
| CPO 16.25 and CPO 16.32   | To require all new developments during the design process to incorporate sustainable electricity technologies in accordance with Part L of the Buildings Regulations and as part of any application for permission, to demonstrate how these requirements will be met. |  |
| CPO 16.27                 | Through coordinated land-use and transport planning, to reduce the demand for vehicular travel and journey lengths   | The proposed development is in a well-connected and centrally located site proximate to a range of services and amenities and public transport options. Therefore, active and public modes of transport can be availed of, thereby   |

| Policy / Objective Number                               | Policy / Objective  | Comment   |               |             |   |  |                                   |   |  |   |
|---|---|---|---------------|-------------|---|--|-----------------------------------|---|--|---|
|   |   | reducing congestion and journey times, etc.   |               |             |   |  |                                   |   |  |   |
| CPO 16.28   | To encourage car-pooling and facilitate park and ride facilities for public transport.  | This is encouraged by the <i>Mobility Management Plan</i> prepared by DBFL.   |               |             |   |  |                                   |   |  |   |
| CPO 16.30   | To facilitate the development of services and utilities for electric vehicles and other low emission alternative vehicles / fuel types, including the roll-out of additional electric charging points and alternative fuel distribution infrastructure in collaboration with relevant agencies at appropriate locations.  | The development incorporates EV charging infrastructure, as comprehensively set out in the enclosed <i>Electric Vehicle Charging Strategy</i> . |               |             |   |  |                                   |   |  |   |
| CPO 16.31   | To require the provision of EV charging points in new developments as follows: <table><tr><th>Building type</th><th>Requirement</th></tr><tr><td rowspan="2">New buildings and buildings undergoing major renovation</td><td>Non-residential buildings with more than 10 parking spaces within property boundary.</td></tr><tr><td>Residential multi-unit buildings.</td></tr><tr><td>New (single-unit residential) buildings</td><td>New 'own door' dwelling with car parking space located within the property boundary.</td></tr><tr><td>New (single-unit residential) buildings</td><td>New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.</td></tr></table> |   | Building type | Requirement | New buildings and buildings undergoing major renovation | Non-residential buildings with more than 10 parking spaces within property boundary. | Residential multi-unit buildings. | New (single-unit residential) buildings | New 'own door' dwelling with car parking space located within the property boundary. | New (single-unit residential) buildings |
| Building type   | Requirement   |   |               |             |   |  |                                   |   |  |   |
| New buildings and buildings undergoing major renovation | Non-residential buildings with more than 10 parking spaces within property boundary.  |   |               |             |   |  |                                   |   |  |   |
|   | Residential multi-unit buildings.   |   |               |             |   |  |                                   |   |  |   |
| New (single-unit residential) buildings                 | New 'own door' dwelling with car parking space located within the property boundary.  |   |               |             |   |  |                                   |   |  |   |
| New (single-unit residential) buildings                 | New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.   |   |               |             |   |  |                                   |   |  |   |

#### 6.10.13 Chapter 17 – Natural Heritage & Biodiversity

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
| CPO 17.1                  | To protect, sustainably manage and enhance the natural heritage, biodiversity, geological heritage, landscape and environment of County Wicklow in recognition of its importance for nature conservation and biodiversity and as a non-renewable resource. | The proposed development's design has sought to consider and incorporate environmental protection. It seeks to retain existing hedgerows and respect the northern watercourse, while augmenting established planting and delivering a detailed regimen of new planting. |
| CPO 17.2                  | Ensure the protection of ecosystems and ecosystem services by integrating full consideration of these into all decision making.  |   |
| CPO 17.3                  | To support and promote the implementation of the County Wicklow Heritage Plan and the County Wicklow Biodiversity Action Plan.   | Significant effects/impacts to the environment, Natura 2000 sites and key ecological receptors have been ruled out in the reporting by Openfield and JBA mentioned below.   |
| CPO 17.4                  | To contribute, as appropriate, towards the protection of designated ecological   | In respect of this CPO, we direct the Council to the <i>Ecological Impact</i>   |

| Policy / Objective Number | Policy / Objective  | Comment  |
|---------------------------|---|--|
|                           | <p>sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).</p> <p>To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents:</p> <ul style="list-style-type: none"> <li>• EU Directives, including the Habitats Directive (92/43/EEC, as amended)<sup>6</sup>, the Birds Directive (2009/147/EC)<sup>7</sup>, the Environmental Liability Directive (2004/35/EC)<sup>8</sup>, the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making' (European Commission 2019);</li> <li>• National legislation, including the Wildlife Acts 1976 and 2010 (as amended), European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural</li> </ul> | <p><i>Statement and Appropriate Assessment Screening Report</i> prepared by Openfield and the <i>EIA Screening and 103(1A)(a) Statement</i> prepared by JBA.</p> |


| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
|                           | <p>Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended)<sup>10</sup> and the Flora Protection order 2015;</p> <ul style="list-style-type: none"> <li>• National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010);</li> <li>• Catchment and water resource management plans, including the National River Basin Management Plan 2018-2021 (including any superseding versions of same);</li> <li>• Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including any superseding versions of same) and the County Wicklow Biodiversity Action Plan;</li> <li>• Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.</li> </ul> |  |
| CPO 17.5                  | Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or   | The <i>Ecological Impact Statement</i> and <i>Appropriate Assessment Screening Report</i> do not envisage significant negative effects/impacts to proposed or existing Natural Heritage Areas or |

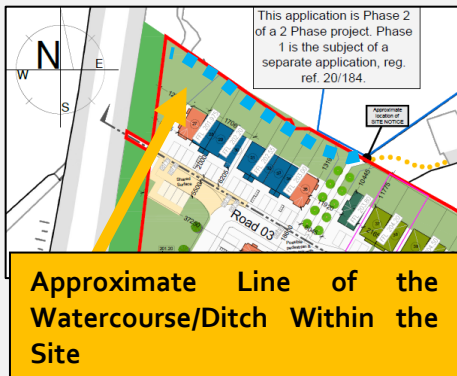
| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
|                           | air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan.   | to existing or candidate Natura 2000 sites.   |
| CPO 17.6                  | Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. |   |
| CPO 17.7                  | To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites in Wicklow.  |   |
| CPO 17.8                  | Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.      |   |
| CPO 17.12                 | To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.  | An <i>Ecological Impact Statement</i> has been prepared. It did not conclude that significant impacts on non-designated sites are expected as a result of the proposed development. |



| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 17.14                 | Ensure that development proposals support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the European network in Wicklow. | Significant effects to Natura 2000 sites and Natural Heritage Areas were ruled out by Openfield's reporting.<br><br>The ecological corridor that is the hedgerow to the north that continues to the watercourse and cluster of trees to the north of (and outside) the site boundary is proposed for retention and augmentation. |
| CPO 17.16                 | Require pollinator friendly landscape management and planting within new developments and on Council owned land.   | Native and pollinator friendly species have been incorporated into the landscape design prepared by Ilsa Rutgers Landscape Architecture.   |
| CPO 17.17                 | Work with statutory authorities to prevent and control the spread of invasive plant and animal species and require, where appropriate Invasive Species Management Plans to be prepared as part of the development management process where necessary.  | No plant species listed as alien invasive under Schedule 3 of SI 477 of 2011 were identified at the subject site.  |
| CPO 17.18                 | To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of the long-term sustainability of a stable ecosystem amenity or the environment generally, as set out in Schedule 17.05 and Maps 17.05 and 17.05A - H of this plan.   | The development incorporates the stretch of mature hedgerow and trees along the site's northern boundary. Only 1 No. tree of note is proposed for removal and was identified in the arboricultural reporting as currently dying.   |
| CPO 17.21                 | To strongly discourage the felling of mature trees to facilitate development and encourage tree surgery rather than felling if such is essential to enable development to proceed.   |  |
| CPO 17.22                 | To require and ensure the preservation and enhancement of native and semi-   |  |

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
|                           | natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments.   |   |
| CPO 17.23                 | To require the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).  |   |
| CPO 17.24                 | To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Documents No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive. | <p>The proposed development incorporates SuDS measures to address surface water, improving its quality and managing its discharge rates, while foul water will be directed to a wastewater treatment plant.</p> <p>We direct the reader to DBFL's <i>Infrastructure Design Report</i> and the ecological and environmental reporting of both Openfield and JBA.</p>     |
| CPO 17.26                 | Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with  | <p>Compared with the previously permitted development on-site, this new proposal has pulled structures farther away from the watercourse.</p> <p>For consistency, we repeat the response provided in the <i>Statement of Response to LRD Opinion</i> in respect of this item:</p> <p>The site's adjacency to an <u>existing watercourse</u> and the presence of the</p> |

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
|                           | <p>undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.</p> | <p><u>riparian zone</u> are noted. The design of the development as it has progressed from the Section 247 meeting to this Planning Application includes a shift of the buildings this part of the site away from the watercourse to the south. As shown from the image below:</p> <ul style="list-style-type: none"> <li>• Within 15 metres of the watercourse development is limited to SuDS features and water services infrastructure, which are generally synergistic.</li> <li>• Between 15 and 20 metres of the watercourse, the pedestrian/cycle path is present and incidental residential front open space. No 'structures' are proposed.</li> <li>• The closest dwelling is approximately 20 metres from the watercourse.</li> </ul>  <p>The Development Plan states that a 25 metre buffer should "<i>generally</i>" be provided and that flexibility can be provided by the Council (CPOs 13.3 and 17.26). Therefore, we contend that no contravention of the Plan occurs.</p> <p>The riparian buffer has been respected with development thereat limited. The nearest building is 20 metres from the watercourse, with the intervention closer to that including footpaths and (importantly) additional SuDS and vegetation. Whilst the foregoing are within the 25 metres generally sought, we are of the opinion that a</p> |

| Policy / Objective Number | Policy / Objective | Comment   |
|---------------------------|--------------------|---|
|                           |                    | <p>dispensation is appropriate in this case due to:</p> <ol style="list-style-type: none"> <li>5. The short stretch of the watercourse through the site;</li> <li>6. The watercourse's culverted configuration to the west;</li> <li>7. The fact that the banks and environs of the watercourse in this location are disturbed;</li> <li>8. The lack of evidence in the Ecological Impact Statement that the watercourse is used by protected species; and</li> <li>9. The need to achieve and appropriate scale and density of development on-site, whilst complying with various other development management criteria.</li> </ol> <p>Additionally, we draw the Council's attention to the fact that Planning Permission was previously Granted for dwellings abutting the stream. Please refer to the extract from the <i>Site Layout Plan</i> drawing of Reg. Ref. 20/362 below. <b><u>Therefore, current proposal is an improvement to the configuration of this part of the site.</u></b></p>  <p><b>Approximate Line of the Watercourse/Ditch Within the Site</b></p> <p>Whilst Inland Fisheries Ireland's guidance is noted, we contend that its blanket imposition at this location would be highly onerous and a regression based on the previously permitted development at the site and its central location within the</p> |

| Policy / Objective Number | Policy / Objective  | Comment   |
|---------------------------|---|---|
|                           |   | settlement. This proposal has sought to retain the existing watercourse and natural features along its edge, supplemented by landscaping and SuDS. The pedestrian path gives utility and amenity value to the space, with dwellings respectfully distanced. |
| CPO 17.35                 | All development proposals shall have regard to the County landscape classification hierarchy in particular the key landscape features and characteristics identified in the Wicklow Landscape Assessment (set in Volume 3 of the 2016 County Development Plan) and the 'Key Development Considerations' set out for each landscape area set out in Section 5 of the Wicklow Landscape Assessment. | The subject site is located in an 'urban area' per the Assessment. Therefore, as a mixed-use development proposed within the existing built-envelope, it is appropriate from a landscape character perspective.   |

#### 6.10.14 Chapter 18 – Green Infrastructure

| Policy / Objective Number | Policy / Objective   | Comment  |
|---------------------------|--|--|
| CPO 18.1                  | To recognise the importance and contribution of Green Infrastructure for the maintenance of biodiversity and ecosystem services, ensuring that the region and county will be better able to adapt and respond to climate change issues.  | The proposed development's design has recognised the existing green infrastructure of the site and its immediate environs and sought to respect same. For example, it is intended to protect and retain the existing hedgerow and treeline along the north-eastern boundary, and even to augment same with new planting.   |
| CPO 18.2                  | To protect existing Green Infrastructure resources and to facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the benefits that can be achieved with regard to the following: <ul style="list-style-type: none"> <li>• provision of open space amenities,</li> <li>• sustainable management of water,</li> <li>• protection and management of biodiversity,</li> <li>• protection of cultural heritage, and</li> <li>• protection of protected landscape sensitivities.</li> </ul> | Additionally, the development – in comparison with the previously permitted scheme on-site – has pulled the proposed residential dwellings farther away from the watercourse at the site's northern corner, thus respecting this feature.<br><br>Green infrastructure will be introduced and improved in the development with the augmentation of the existing hedgerow and the provision of a |

| Policy Objective Number | Policy / Objective  | Comment   |
|-------------------------|---|---|
| CPO 18.3                | New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment.   | substantial tree planting regimen, as designed by Ilsa Rutgers (please refer to the enclosed landscape proposals for specific details of same). 'Soft', nature-based landscaping proposals are at the core of this, with native planting featuring: <ul style="list-style-type: none"> <li>• Sessile Oak;</li> <li>• Pedunculate Oak;</li> <li>• Silver Birch;</li> <li>• Hawthorn;</li> <li>• Alder;</li> <li>• Dog Rose; and</li> <li>• Hazel.</li> </ul> |
| CPO18.8                 | To require the integration of Green Infrastructure principles and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space.   | Nature-based SuDS solutions, which will support green infrastructure, include: <ul style="list-style-type: none"> <li>• Tree pits,</li> <li>• Swales and</li> <li>• Bioretention areas.</li> </ul>  |
| CPO 18.5                | To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways, bridleways and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites. | The proposed development intends to respect the existing hedgerow and watercourse to the north of the site, which will be linked with the proposed planting regimen through the site and across the Blessington Inner Relief Road to the open space to the west delivered under Reg. Ref. 201146. <p>Street tree planting through the scheme will support the creation of internal GI corridors, stepping stones and refuges.</p>                           |

#### 6.11 Blessington Local Area Plan 2013–2019

The following Sub-Sections provide an overview of the proposed development's consistency with the relevant policies and objectives of the *Blessington Local Area Plan 2013–2019*.



### 6.11.1 Section 2 – Population and Housing

| Policy Objective Number | Policy / Objective   | Comment  |
|-------------------------|--|--|
| PH1                     | To adhere to the objectives of the Wicklow County Development Plan in regard to population and housing as are applicable to the plan area.   | The proposed development has been designed and considered in the context of the Development Plan's Core Strategy and its housing targets. It will play an important role in delivering much needed housing in the County and Blessington in particular.<br><br>Further details are provided in Section 7.2 below, which we are of the opinion are vital to review in response to PH2. The provisions of the Development Plan for infill development override this objective. |
| PH2                     | Notwithstanding the zoning of land for residential purposes, the Development Management process shall monitor and implement the population targets for Blessington as set out in the County Development Plan and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded. |  |

### 6.11.2 Section 3 – Town Centre Strategy and Retail

| Policy Objective Number | Policy / Objective  | Comment   |
|-------------------------|---|---|
| TC1                     | To support and facilitate activities and developments that will improve the vitality, connectivity and vibrancy of the town centre areas.   | Additional housing will introduce more spending power, thereby supporting existing businesses and encouraging the establishment of new ones. The mix of uses on the town centre zoned portion of the site will generate activity and vibrancy given the ground floor level position and presentation to the public at the south. Connectivity will be improved with the range of pedestrian and cycle infrastructure and new crossing points. |
| TC3                     | To ensure that all new applications for retail development accord with the provisions of the "Retail Planning Guidelines for Planning Authorities" (DOEHLG 2012), and any subsequent Ministerial Guidelines or directives and the Wicklow County Retail Strategy. | The retail use is a pharmacy, thus a very specific type of offering that will not compete with the retail core of the town centre.<br><br>Notwithstanding this, the use is appropriate as it is proposed on the town centre zoned portion of the site and synergises with the proposed medical centre,  |

| Policy Objective Number | Policy / Objective | Comment  |
|-------------------------|--------------------|--|
|                         |                    | residential units and uses at the Dunnes Stores mixed-use development to the south-east. |

### 6.11.3 Section 4 – Employment & Enterprise

| Policy Objective Number | Policy / Objective   | Comment   |
|-------------------------|--|---|
| E1                      | To facilitate the development of employment generating activities on suitably zoned lands within Blessington in accordance with the objectives and development standards set out in the County Development Plan.   | The proposal is sited on a currently vacant, infill site. The proposed development's medical centre, café and pharmacy will all create employment opportunities within the centre of Blessington.<br><br>The location of these uses is zoned town centre, thus making them the appropriate location for same. |
| E2                      | To protect employment zoned land from inappropriate development that would undermine future economic activity or the sustainable development of such areas.  |   |
| E3                      | To encourage the redevelopment of already developed or brownfield employment / mixed use lands for enterprise and employment creation throughout the settlement, subject to the proper planning and sustainable development of the area and compliance with all other objectives of this plan. |   |
| E4                      | To encourage the development of significant new employment zones at<br><br>- Downshire demesne lands (part of permitted 'Cookehill' development)<br>- Roadstone<br>- Haylands / Mart site<br><br>in accordance with the detailed requirements set out in Section 10 of this plan.              |   |

### 6.11.4 Section 5 – Tourism

| Policy Objective Number | Policy / Objective                                    | Comment  |
|-------------------------|---|--|
| T1                      | To promote and facilitate improvements to tourism and | The proposed development comprises a series of public open spaces which are well distributed |

| Policy Objective Number | Policy / Objective                                 | Comment   |
|-------------------------|--|---|
|                         | recreation infrastructure in the Blessington area. | across the site, which will notably enhance recreation infrastructure in Blessington. Pedestrian and cycle paths are directed through the new public open spaces, which provide amenities for all ages. |

#### 6.11.5 Section 6 – Social Infrastructure

| Policy Objective Number | Policy / Objective  | Comment   |
|-------------------------|---|---|
| CD3                     | To facilitate opportunities for play and sport and support the implementation of the County Council 'Play' and 'Sports & Recreation' Policies and their objectives, including the collection of development levies. | The development includes a children's play area at its very centre. This will encourage physical activity and promote social interaction and integration. |

#### 6.11.6 Section 7 – Service Infrastructure

| Policy Objective Number | Policy / Objective  | Comment  |
|-------------------------|---|--|
| S1                      | To implement the objectives and development standards of Chapters 11, 12, 13 and 14 of the County Development Plan as applicable to Blessington.  | To avoid lengthy duplication, please refer to the responses prepared in respect of the relevant Policies and Objectives of Chapters 12, 13 and 14 of the Development Plan above.   |
| S3                      | To have regard to the provisions of the 'The Planning System and Flood Risk Management' Guidelines (DoEHLG 2009) and the Flood Risk Assessment carried out as part of this plan.  | A <i>Site-Specific Flood Risk Assessment</i> has been prepared by DBFL in accordance with the 2009 Guidelines. Whilst it is available for review as part of the Planning Application materials, we have extracted its conclusion:                                    |
| S4                      | Applications for developments in high or moderate flood risk areas (Flood Zones A and B) shall be assessed in accordance with 'The Planning System and Flood Risk Management Guidelines (Nov 2009 DEHLG & OPW)'. Where the planning authority is considering proposals for new development in areas at high or moderate risk of flooding that include types of development that are vulnerable to flooding and that would generally be inappropriate as set out in Table 3.2 of the Guidelines, the planning authority shall be satisfied | <i>"The Site-Specific Flood Risk Assessment for the proposed development in Blessington was undertaken in accordance with the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and its Technical Appendices.</i> |

| Policy Objective Number | Policy / Objective   | Comment   |
|-------------------------|--|---|
|                         | that the development satisfies all the criteria of the Justification Test for development management, as set out in Box 5.1 of the Guidelines. Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines.  | <i>Following the Flood Risk Assessment, it has been determined that all developable land within the site is located in Flood Zone C as defined by the Guidelines.</i>   |
| S5                      | Notwithstanding the identification of an area as being at low or no risk of flooding (Flood Zone C) where the Planning Authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment may be required to be submitted by an applicant for development permission. | <p><i>The area where flood Zone A encroachment on the site is not proposed for development and therefore does not affect the classification of the portion of the site which is being developed.</i></p> <p><i>It is concluded that the;</i></p> <ul style="list-style-type: none"> <li><i>Proposed development is appropriate for the site's flood zone category.</i></li> <li><i>The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.</i></li> </ul> <p><i>In conclusion, the proposed development is considered to have the required level of flood protection."</i></p> |
| S7                      | To facilitate the completion of the Inner Relief Road.   | The proposed development has sought to improve the surrounding road network. Evidence of this are the pedestrian and cyclist crossings at the Blessington Inner Relief Road roundabout to the west and at the Blessington Inner Relief Road to the north-west.  |
| S9                      | To improve / provide new footpaths and cycleways on existing roads as funding allows and to facilitate the provision of new roads, footpaths and cycleways as detailed in chapters 3, 5 and 10 of this plan.   | While the proposed development delivers an internal road network in accordance with the <i>Design Manual for Urban Roads and Streets</i> and the <i>Cycle Design Manual</i> , it has also sought to improve the surrounding road network. Evidence of this are the  |

| Policy Objective Number | Policy / Objective | Comment  |
|-------------------------|--------------------|--|
|                         |                    | pedestrian and cyclist crossings at the Blessington Inner Relief Road roundabout to the west, at the Blessington Inner Relief Road to the north-west and at the link street beside Cocoon Childcare to the south-east. |

#### 6.11.7 Section 8 – Built and Natural Heritage

| Policy Objective Number | Policy / Objective   | Comment  |
|-------------------------|--|--|
| BD1                     | To protect the natural, architectural and archaeological heritage of the town, in accordance with the objectives and development standards set out in Chapters 16 and 17 of the County Development Plan as are applicable to Blessington and its environs.   | To avoid lengthy duplication, please refer to the responses prepared in respect of the relevant Policies and Objectives of Chapters 8, 16 and 17 of the Development Plan above.  |
| BD2                     | No development will be permitted that adversely affects the integrity of a Natura 2000 site. All development proposals shall comply with the following objectives:<br>(i) Any proposed development with potential to impact upon a Natura 2000 site shall be subject to an Appropriate Assessment in accordance with Article 6(3) of the EU Habitats Directive 1992 and 'Appropriate Assessment of plans and projects in Ireland-Guidance for Planning Authorities' (DoEHLG, 2009).<br>(ii) Avoid encroachment on a Natura 2000 site and implement an appropriate buffer zone on adjacent sites, as required, where feasible or as determined following consultation with NPWS or other relevant body.<br>(iii) Ensure that recreational use is directed away from sensitive areas within the Natura 2000 sites. | The proposed development's design has sought to consider and incorporate environmental protection. It seeks to retain existing hedgerows and respect the northern watercourse, while augmenting established planting and delivering a detailed regimen of new planting.<br><br>Significant effects/impacts to the environment, Natura 2000 sites and key ecological receptors have been ruled out in the reporting by Openfield and JBA. |
| BD3                     | In the interests of the protection and enhancement of biodiversity in Blessington, it is an objective of this plan to:<br><ul style="list-style-type: none"> <li>Protect trees, hedgerows and wooded areas (particularly those containing indigenous</li> </ul>  |  |

| Policy / Objective Number | Policy / Objective   | Comment   |
|---------------------------|--|---|
|                           | <p>species), watercourses and other features of the natural landscape</p> <ul style="list-style-type: none"> <li>Require the planting of indigenous plant and tree species in new developments and in the restoration of former quarry lands.</li> </ul> |   |
| BD5                       | To facilitate the use of natural areas for active outdoor pursuits, subject to the highest standards of habitat protection and management and all other normal planning controls.  | The proposed development comprises a series of public open spaces which are well distributed across the site and comprise amenities for all ages. |



## 7.0 PLANNING POLICY CONTEXT AND ASSESSMENT

The purpose of the following Section is to provide a planning overview and assessment of the proposed development, demonstrating compliance with the Development Plan and key national guidance. This allows for a broader assessment of the proposal in support of a Grant of Planning Permission.

### 7.1 Land-Use Zoning

The zoning of the subject site has most recently been prescribed by the LAP. 'Proposed Residential' (R1) is the main zoning, with 'Town Centre' (TC) also present to the south and east and a small area of the site, at its northernmost corner, zoned 'Open Space' (OS) (Figure 7.1).

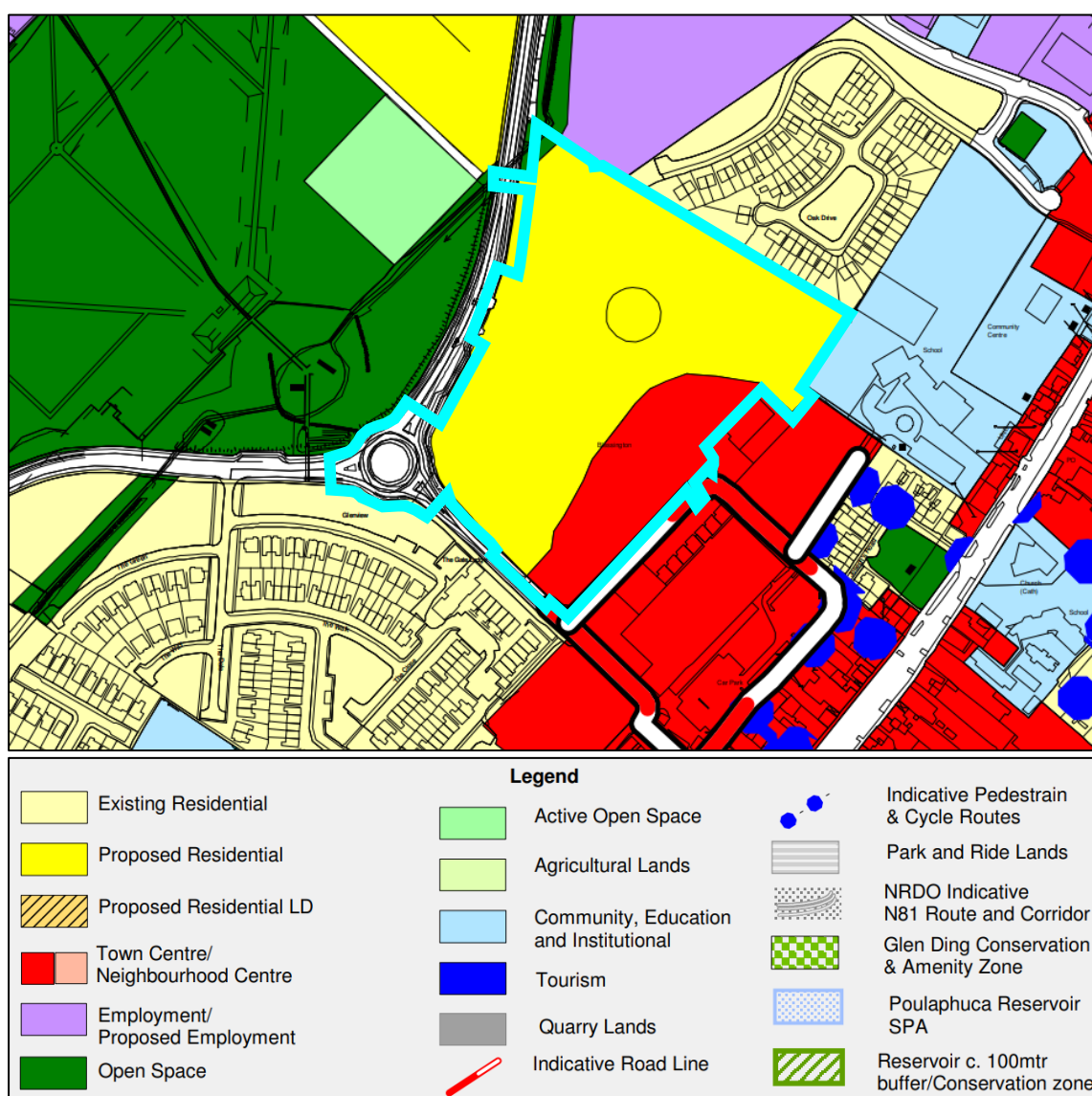


Figure 7.1: Land-use zoning map with the indicative boundary of the subject site outlined in turquoise

Source: *Blessington Local Area Plan 2013–2019*, annotated by Thornton O'Connor Town Planning (2023)

The zoning objectives of the 3 No. designations on-site are as follows:

- **New Residential (R1)** – “To protect, provide and improve residential amenities.”
- **Town Centre (TC)** – “To provide for the development and improvement of appropriate town centre uses including retail, commercial, office and civic use, and to provide for ‘Living Over the Shop’ residential accommodation, or other ancillary residential accommodation.”
- **Open Space (OS)** – “To preserve, provide and improve recreational amenity and passive open space.”

### 7.1.1 Permitted in Principle Uses and Justifying the Proposed Uses

The zoning and land-use matrix set out in Section 10.2 of the LAP notes that “residential”, “residential institution”, “hospital/nursing home” and “community facilities” are all listed as “permitted in principle” uses on R1-zoned and TC-zoned lands. Additionally on the TC-zoned lands, the LAP includes “doctor/dentist etc/health centre”, “restaurant”, “shops (local)”, “shops (other)” and “residential” as “permitted in principle” uses.

The proposal includes 233 No. ‘standard’ residential dwellings, which are located on the R1-zoned portion and part of the TC-zoned portion of the site. **Therefore, they are compliant from a land-use perspective as “permitted in principle” uses.**

For absolute clarity, the various uses proposed on the 2 No. separate zonings are presented in Table 7.1 below, with the areas demarcated per the DGA drawing extract presented in Figure 7.2 below (see DGA’s drawing titled *Proposed Site Plan (Zoning Overlay)*).

| On the Residential Zoned Lands  | On the Town Centre Zoned Lands   |
|---|--|
| <ul style="list-style-type: none"> <li>• 206 No. ‘standard’ houses and duplexes.</li> </ul> | <ul style="list-style-type: none"> <li>• 27 No. ‘standard’ houses.</li> <li>• 36 No. later living houses and apartments.</li> <li>• Medical centre (224 sq m).</li> <li>• Pharmacy (115 sq m).</li> <li>• Café (60 sq m).</li> </ul> |

**Table 7.1:** Uses proposed on the R1- and TC-zoned portions of the subject site

**Source:** Deady Gahan Architects and Thornton O’Conor Town Planning (2024)



**Figure 7.2:** Overlay of the site zonings on the proposed site plan

**Source:** Deady Gahan Architects (2024)

### 7.1.1.1 Uses on the R1-Zoned Portion of the Site

With respect to the housing on the R1 area of the site, we contend that the dwellings proposed will wholly comply with, and support the attainment of, the R1 zoning objective to "...protect, provide and improve residential amenities."

### 7.1.1.2 Uses on the TC-Zoned Portion of the Site

A further 36 No. Later Living Units (LLUs) are proposed on the TC portion of the site. Although this unique housing typology is not explicitly identified in the LAP's matrix, we are of the opinion that it is appropriate as a *sui generis* use given the TC zoning includes "residential", "residential institution", "hospital/nursing home" and "community facilities" as permitted in principle uses. The LLU use has similarities with these 4 No. permitted uses given it provides housing but with a potential level of care. It will also support a broadening of housing tenures and typologies in the area, thereby enhancing the town's stock of accommodation, as advocated for by the Development Plan's objective CPO 6.27 (discussed in Section 7.6 below). We contend that the use, as a differentiation from 'standard' housing, aligns with the principles that underscored the permitting of the nursing home at the site under Reg. Ref. 20184.

The LLUs will also play a social role in the community by facilitating the roll-out of a transitional housing typology to allow for right-sizing (downsizing) and greater community-based support and care provision, as complemented by the proposed medical centre (see below). Its distinction from the 'standard' residential units will be via the establishment of a standalone management entity. Additionally, we contend that it will accord with the TC zoning objective by diversifying the range of uses prevalent and the creation of critical mass to sustain local business and service provision.

On the point of LLUs as a quasi-community or civic uses, we draw the Planning Authority's attention to 2 No. useful precedents in Meath County Council where Planning Permissions were Granted for sheltered housing in Ratoath (Reg. Ref. RA201957) and independent living in Summerhill (Reg. Ref. 231041). These schemes, whilst of a 'residential' typology, are distinct from 'standard' housing but highly similar to the LLUs proposed as part of this Planning Application. Permitted on lands zoned as 'G1 – Community Infrastructure', **these housing types demonstrate their broader importance beyond being 'just housing', but as integral parts of community and social infrastructure and supporting the principles of transitional housing and 'ageing in place'.**

However, since the initial Section 247 PPC meeting and the Section 32C LRD Meeting, the proposed mix of uses has been further broadened. The entire ground floor level of the mixed-use building now includes non-residential uses. There are 3 No. commercial units extending to 399 sq m in total:

- A medical centre (224 sq m);
- A pharmacy (115 sq m); and
- A café (60 sq m).

The medical centre will enhance the availability of this important community use in the settlement and complement the proposed LLUs. It will create a strong synergy with the proposed pharmacy, which will activate the southern portion of the ground floor area. The café use will create vibrancy and employment opportunities, benefiting from the proposed plaza area to the front of the building.

Concerns raised by the Planning Authority under item (i) of the list of reasons why *"the documents submitted do not constitute a reasonable basis on which to make an application"* are noted. Specifically, they contended that the documentation submitted did not demonstrate that the at proposal would be in accordance with the zoning objective for TC-zoned due to the *"limited range of town centre uses proposed"*. In response to this, we provide the following important points.

1. The TC zoning objective states the following: *"To provide for the development and improvement of appropriate town centre uses including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation, or other ancillary residential accommodation."*

We have reviewed the wording of the objective and note that its use of *"including"* means that the *"appropriate town centre uses"* **are not limited to** retail, commercial, office, civic and living over the shop / ancillary residential. There is no stated limitation on uses in the objective, with the acceptability of uses to be drawn from Blessington Zoning Matrix in the LAP (Section 10.2 therein), which are further discussed below.

2. In relation to the contended *"limited range of town centre uses proposed"*, we firstly wish to emphasise the 3 No. non-residential uses that now comprise the entire ground floor level of the mixed-use building. This is substantial increase on the single commercial/café units of 215.8 sq m presented in the Section 32C LRD Meeting proposal. Evidently, the Applicant and Design Team have acted upon the comments received from the Planning Authority.

Secondly, we contend that *"appropriate town centre uses"* can only be informed by the use guidance contained in Section 10.1 and 10.2 of the LAP. Section 10.1 contains the Blessington Zoning Matrix. We firmly contend that the *"appropriate town centre uses"* are those listed as being *"permitted in principle"* or *"not normally permitted"* (with the benefit of ample justification).

#### 7.1.2 Precedent for Granting Planning Permission for Wholly Residential Development on TC-Zoned Lands in Blessington

Notwithstanding the foregoing, we wish to also make reference to a decision by the Council and An Bord Pleanála to Grant Planning Permission for a wholly residential development at a TC-zoned site adjacent to the subject site. Reg. Ref. 19/1020 (ABP Ref. 306425) was permitted to deliver 58 No. apartments units at the site identified as '3' on Figure 7.3 below.

In their assessment, the Planning Authority provide the following analysis and justification:

*"The site is located on lands zoned TC, Towns [sic] Centre to provide for the development and improvement of appropriate town centre uses including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation, or other ancillary residential accommodation. In such core town centre areas it is a general requirement that a mix and balance of different type of uses active uses will normally be required at ground floor level i.e. retail, commercial, community or leisure uses. In terms of the type of residential development proposed, apartments generally will only be permitted within the designated centres in settlements (i.e. designated town, village or neighbourhood centres), on mixed use designated lands (that are suitable for residential use as part of the mix component) or within 10 minutes walking distance of a train or light rail station. In this particular situation given the town centre location of site, in close proximity to a public bus corridor, level of retail space in the vicinity and the level of vacant units both*

*within the adjacent town centre shopping centre and within the town, a development consisting of residential apartment units only on this site is considered acceptable. The principle of residential apartment development is therefore acceptable subject to appropriate density, siting & design, traffic safety and that the proposals do not have any adverse impact on the surrounding residents."*

The An Bord Pleanála *Inspector's Report* contained no assessment of land-uses and principles of development.

Evidently, the Council has supported solely residential development on TC-zoned lands in Blessington and did not consider that this use alone would be contrary to the attainment of the TC zoning objective, as indicated in the *LRD Opinion* issued in respect of the development proposed herein. Consequently, our proposal is a progressive effort to broaden the range of housing typologies in the town, as well as the sustainable mix of uses in a central location.

### 7.1.3 Other Town Centre Zoned Sites Available for Development

A review of the town's lands zoned by the LAP as TC reveals that multiple other sites remain available for commercial and other non-residential uses, thereby ensuring continued availability for a broad range of use (Table 7.2 and Figure 7.3).

These sites are all centrally located and more regularly shaped than the TC-zoned portion of the subject site. Evidently, all 5 No. sites remain available for development having not being built-upon, despite some evidence of intentions to do so.

The intention of this exercise is to demonstrate that although a mix of uses is proposed on the TC-zoned portion of the subject site, there remains multiple other opportunity sites where a range of uses, non-residential in particular can be delivered.

| Site ID | Site Location  | Application On-Site                            | Development Type                  | Commenced |
|---------|--|--|-----------------------------------|-----------|
| 1       | Site at the junction of the Naas Road (R410) and Main Street (N81)                                 | No recent applications.                        | N/A                               | N/A       |
| 2       | Site to the south of the subject site, opposite Dunnes Stores                                      | No recent applications.                        | N/A                               | N/A       |
| 3       | Site to the east of Cocoon Childcare   | Yes: WCC Reg. Ref. 19/1020, ABP Ref. 306425.   | 58 No. residential dwelling only. | No        |
| 4       | Multiple sites to the west of the N81, north of Oak Drive  | No recent applications for large developments. | N/A                               | N/A       |
| 5       | Multiple backland sites to the rear of existing development at Main Street, north of Kilbride Road | No   | N/A                               | N/A       |

**Table 7.2: Other TC-zoned sites of note within the settlement of Blessington with development potential**

**Source:** Thornton O'Connor Town Planning (2024)



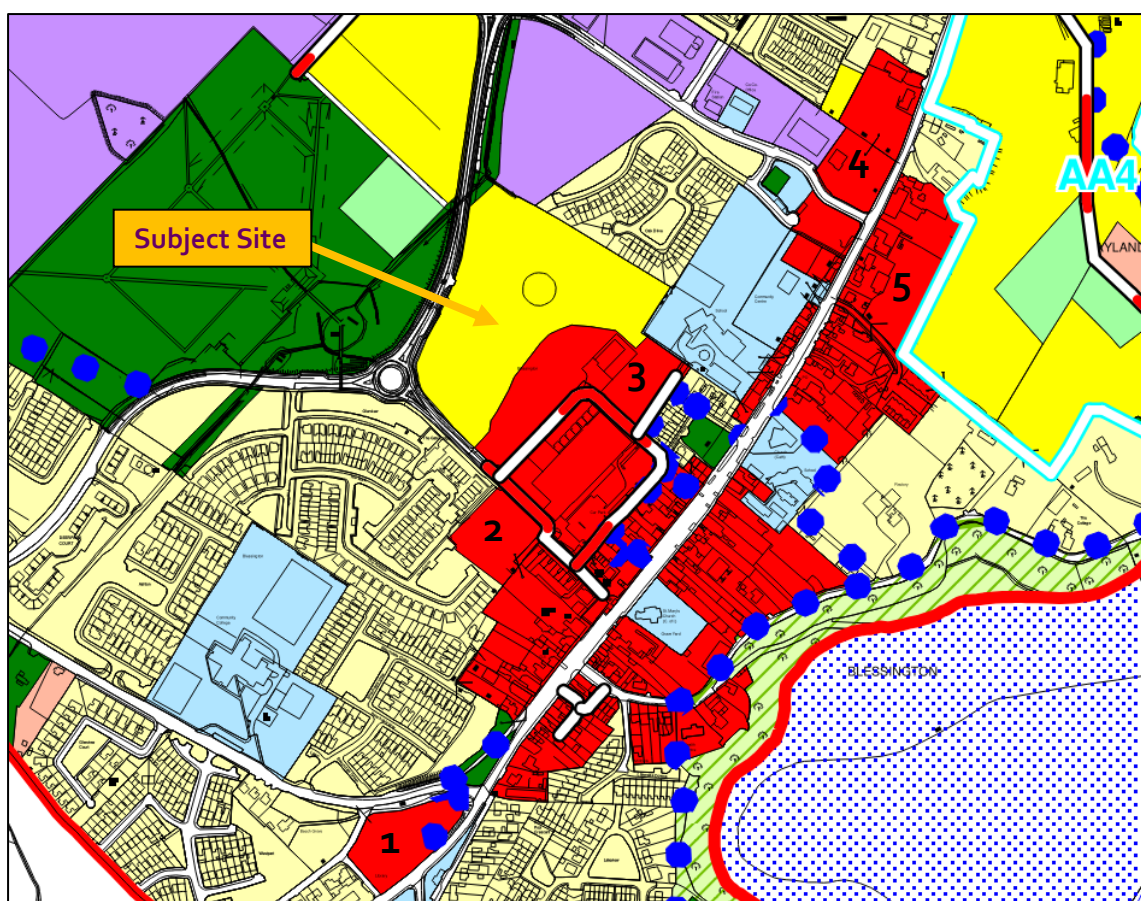


Figure 7.3: Map of undeveloped Town Centre zoned lands in Blessington

Source: *Blessington Local Area 2013–2019*, annotated by Thornton O'Connor Town Planning (2024)

#### 7.1.4 Note on Development at the OS-Zoned Portion of the Site

For clarity, no physical development at, or residential use of, the OS-zoned portion of the site is proposed. It will provide an open space and amenity function, in accordance with the zoning. No SuDS features are proposed in this area and their extent, although proposed for open space use, has not been included in the calculation of 15% public open space.

#### 7.2 Core Strategy

During the discussions held as part of the statutory Section 247 and 32C consultations, the Applicant and Design Team emphasised the sequentially appropriate and centrally located nature of the subject site. It was asserted that these attributes, alongside its infill context warranted it coming forward for development immediately, despite concerns raised by the Planning Authority in respect of core strategy numbers.

During those meetings (and as we present now for completeness), it was emphasised that the Development Plan provides flexibility for development in key locations that comply with



principles of sustainable, sequential and infill development. Under Zoning Principle 1 (Compact Growth), the Plan states the following for housing in Level 1–5 settlements<sup>17</sup>:

*"For larger towns in Levels 1-5, where more significant growth is targeted that is unlikely to be possible to accommodate wholly within the existing built up envelope, a minimum of 30% of the targeted housing growth shall be directed into the built up area of the settlement. In cognisance that the potential of town centre regeneration / infill / brownfield sites is difficult to predict, **there shall be no quantitative restriction inferred from this Core Strategy and associated tables on the number of units that may be delivered on town centre regeneration / infill / brownfield sites.**" [emphasis original]*

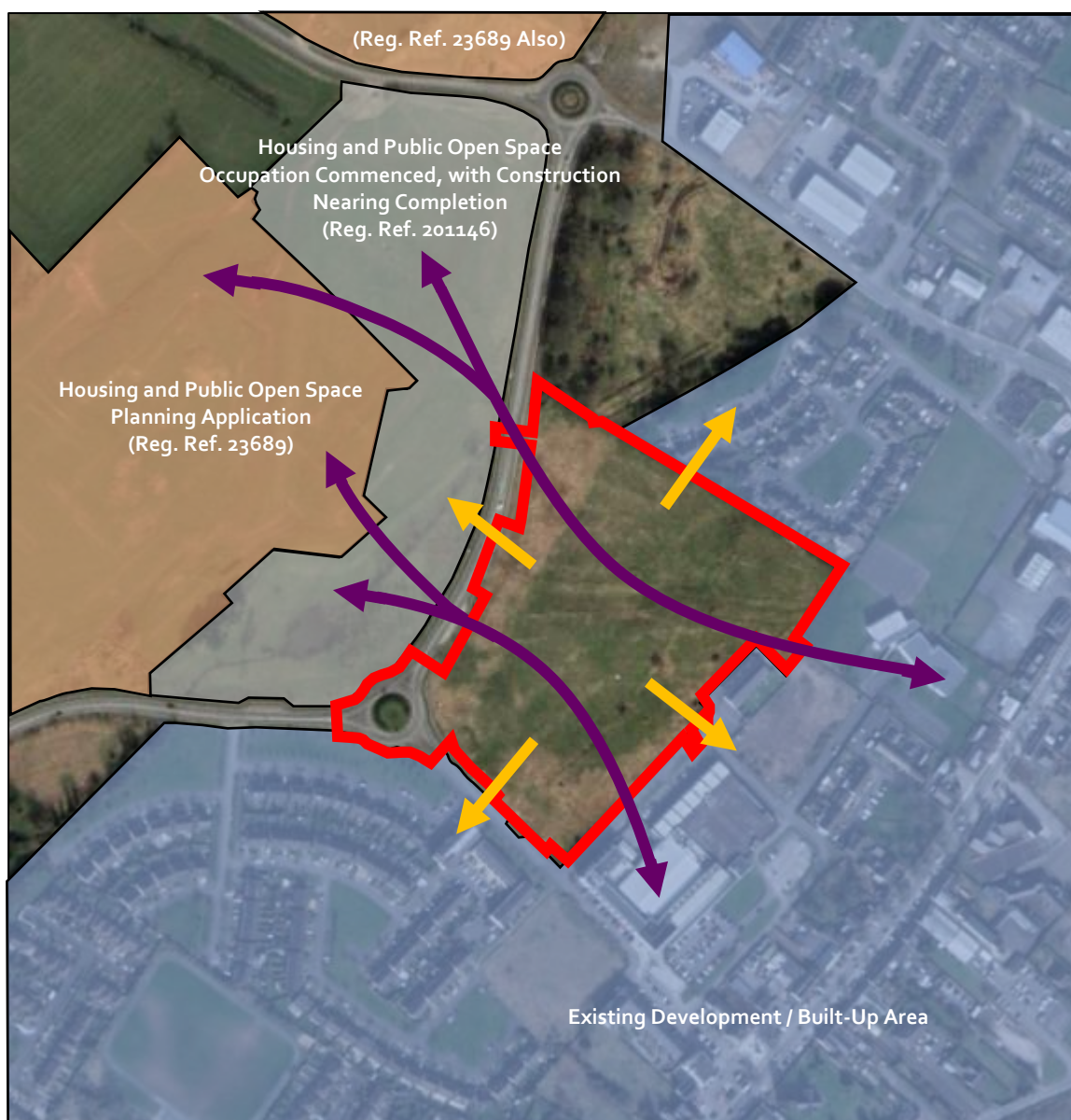
We contend that the subject site is "infill" as it is surrounded by development on 4 No. sides (Figure 7.4). Existing, well-established development is present to the north-east, south-east and south-west. To the north-west, we note that despite not being present in the most recently available aerial images, the residential and public open space of Reg. Ref. 201146 is nearing completion (having commenced in March 2023 according to the BCMS), with houses already occupied<sup>18</sup>. Whilst beyond that, Reg. Ref. 23689 was Granted Planning Permission by the Council, although is currently on Appeal to An Bord Pleanála (ABP Ref. 319657). See orange arrows in Figure 7.4.

**Therefore, the above quoted provision of the Development Plan applies to the subject site, with no Core Strategy restriction in terms of unit numbers applying.**

Yet not only is the site infill in nature, but we have shown via the purple arrows on Figure 7.4 how it can positively integrate with the existing and expanding Built-Up Area of the town. **This will counter the apparent leapfrogging of the site due to the permission of Reg. Ref. 201146, knitting Blessington's growth into a consolidated stretch of development, which directly accords with the sequential approach to development – as advocated for in the *Development Plan Guidelines* (2022) – by delivering it closer to the town's centre.**

<sup>17</sup> The Development Plan recognises Blessington as a Level 3 'Self-Sustaining Growth Town' within the 'Core Region' of County Wicklow's Settlement Hierarchy. Such settlements have 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."

<sup>18</sup> [www.irishtimes.com/property/residential/2023/09/07/a-blessed-life-near-blessington-lakes-in-new-homes-from-425000/](https://www.irishtimes.com/property/residential/2023/09/07/a-blessed-life-near-blessington-lakes-in-new-homes-from-425000/) and [www.coonan.com/property/sorrel-wood-blessington-co-wicklow-2/](https://www.coonan.com/property/sorrel-wood-blessington-co-wicklow-2/)



**Figure 7.4:** Orange arrows demonstrating the site's enclosure on its 4 No. sides, making it 'infill', and purple arrows demonstrating how the site's development will integrate the existing and under construction area of the town to counter leapfrogging

**Source:** Google Earth (image March 2022), annotated by Thornton O'Connor Town Planning (2024)

We note that it was referenced by the Planning Authority during the initial Section 247 PPC that the above quoted provision of the Development Plan was for unique situations and that "*town centre regeneration / infill / brownfield sites*" were only intended to be those within the CSO's defined town/settlement boundary. **However, in relation to Principle 1 Compact Growth, no reference to the CSO's boundary is evident. Therefore, we firmly contend that the provision applies to the subject site, which is infill in nature, has been leap-frogged by development, abuts the town centre area and is partially zoned as town centre.**

Despite the position initially taken by the Planning Authority during the Section 247 and 32C discussions, we note that in the *Planner's Report* that accompanied the *LRD Opinion*, it was concluded that their stance changed:

*"...it is considered that the site is 'infill' and comes within the scope of Principle 1: Compact Growth of the Zoning Principles set out in Section 3.5 of Chapter 3 of the CDP 2022-2028. Consequently, there is no restriction on unit numbers arising from the housing target figures set out in the Core Strategy. Therefore, the proposed development is considered to be in line with the Core Strategy in terms of housing numbers." [emphasis added]*

**Informed by the above insights, we firmly contend that as an infill development in the centre of the existing Blessington settlement, the provisions of 'Principle 1 Compact Growth of the Development Plan apply, thus making the proposal 'neutral' in respect of core strategy numbers. Furthermore, we contend that the proposal will support the delivery of the core strategy and accords with the overarching principles of the NPF to deliver sustainable, compact growth.**

### 7.3 Built-Form: Plot Ratio, Site Coverage and Building Height

Development management standards relating to site coverage, plot ratio and building height work in conjunction with each other to define the bulk and scale of a development. This is then articulated and defined to distribute the massing as an appropriate and attractive built-form. Generally, when particular site coverage and plot ratio standards are set, they inform the height of a development.

These factors then relate to inform or dictate density, which is discussed in Section 7.4 below.

#### 7.3.1 Plot Ratio and Site Coverage

No plot ratio or site coverage standards are prescribed by the Development Plan in its Appendix 1 ('Development & Design Standards'). However, for completeness we have provided them here to give an indication of the scale and intensity of development at the subject site.

Based on the Net Developable Area of 5.35 Ha (or 53,500 sq m), the site coverage equates to 23.7%. Using the same Net Developable Area and the gross floor area of 23,219.1 sq m, a plot ratio of 0.43 is achieved.

Both metrics appropriately reflect the type of development and the location of the site, noting the type and scale of settlement that is Blessington. They are both increases on the same metrics from the PPC and LRD Meeting stage, **evidence of the increased intensity of development, as sought by the Planning Authority during the meetings (Table 7.5).**

| Stage                             | Site Coverage | Plot Ratio |
|-----------------------------------|---------------|------------|
| Section 247 – PPC                 | 22.0%         | 0.36       |
| Section 32C – LRD Meeting         | 23.5%         | 0.42       |
| Section 34 – Planning Application | 23.7%         | 0.43       |

**Table 7.5: Site coverage and plot ratio of the evolving development proposal at Section 247, Section 32C and Application stages**

**Source:** Deady Gahan Architects (2023 and 2024)

#### 7.3.2 Building Height

Guidance with respect to building height is set out in Section 3.1.2 of the Development Plan.

*"Building height can make a positive contribution to the identity and character of an area. In general terms, **building height shall be assessed having regard to the building's function, location, setting and whether it can be successfully integrated into the existing streetscape** without being unduly overbearing, obtrusive or impacting adversely on existing amenities. **Excessive height relative to local context will not be permitted where it would result in visually obtrusive or overbearing buildings.** Sense of enclosure is generally measured as a ratio where the height of a building is measured against the width of the street. Enclosing streets with buildings helps to define them as urban places, creates a greater sense of intimacy and promotes them as pedestrian friendly spaces that are overlooked. The relationship between building height and street width is important for creating a strong urban structure.*

***Proposals including buildings that are of a height and scale significantly greater than the prevailing height and scale shall be assessed in accordance with the development management criteria set out in Section 3.0 of the Urban Development and Building Heights Guidelines (DHPLG 2018)."** [emphasis added]*

The height of the proposed development ranges from 1 No. to 5 No. storeys. This is considered to be appropriate and respectful of existing development in the immediate environs of the site. Furthermore, we contend that it ties in with the heights in the site's context; therefore, **it is not a height, nor does it represent a scale of development**, that is "significantly greater than the prevailing height and scale" of the area. For example, at the lower end, 2-storey dwellings are present at Glen View to the south-west of the site and in Oak Drive to the north-east. Yet this increases to 5 No. storeys at the mixed-use Newtown development to the south-east of the site. Local variation is also evident at The Close and the link street between Main Street and the site (stretch of mixed-use buildings), where 3 No. storeys prevail.

The proposal, therefore, aligns with existing heights. It will "be successfully integrated into the existing streetscape", and is not comprised of "visually obtrusive or overbearing buildings".

The distribution of height across the development has been given careful consideration. The 5-storey mixed-used block in the southernmost corner creates a relationship and transition in height with the 5-storey mixed-use development to the south/south-east, before transitioning down to 3 No. storeys along the south-western and north-western site frontages (Figure 7.3) and tying in with the 3 No. storeys at Glen View to the south-west. This approach allows for respectful gradations and transitions in height, whilst also defining a more robust and responsive built-edge to the road network, especially the Blessington Inner Relief Road to the north-west (as requested by the Council during the PPC and re-affirmed during the LRD Meeting). Additionally, we highlight for the Planning Authority's attention the increase from 4 No. storeys for the mixed-use block at LRD Meeting stage to 5 No. storeys in this Application, having reflected upon the remark in the *LRD Meeting Planner's Report* that:

*"Having regard to the surrounding context, it is considered that there is potential for greater height within the scheme, particularly on the eastern side, adjacent to Blessington Shopping Centre."*





**Figure 7.5: Distribution of heights across the proposed development**

**Source: Deady Gahan (2024)**

The approach to delivering height also carries to *within* the scheme. As shown in Figure 7.3 above, whilst 1 No. and 2 No. storeys prevail in the centre of the development, an appropriate inclusion of 3 No. storeys features at key corners, thereby (1) defining these more prominent plots, (2) creating 'local landmarks' to aid legibility and navigability and (3) the delivering points of architectural and design interest.

A series of just 7 No. single-storey LLU dwelling are also proposed, which deliver a specific housing typology for future residents and a beneficial variation in form and local character that attractively clusters around open space and interfaces compatibly with the void created by the setting back of the commercial units on the site to the south-east.

Given the foregoing insights, **the proposed heights are considered to be appropriate and in accordance with policy/guidance**. As there are no heights "*significantly greater than the prevailing height and scale*", there is no formal requirement to assess them against the management criteria established by the *Urban Development and Building Heights Guidelines*.

## 7.4 Residential Density

### 7.4.1 Policy Basis

As the overarching planning policy document, the NPF is the key basis for the State's development. The NPF recognises the benefit of securing greater densities in existing urban areas to achieve scale, critical mass, vibrancy, a positive shift in infrastructural use and ecological protection:

*"Well designed and located higher density housing will assist:*

- *Fast-growing urban areas to achieve much needed scale;*
- *Medium-sized urban areas to find a route to quality in a new competitive framework;*
- *All urban areas to increase vibrancy and vitality;*
- *Increased efficiency and sustainability in the use of energy and public infrastructure."*

Asserting this as a policy stance, the NPF includes NPOs which all support more efficient and sustainable use of land in existing settlements. Evidently, there is a strong national policy base to support the attainment of higher residential densities and land-use intensities, even in areas where there may be prevailing patterns of low density development (see box below). Such patterns of development are no longer deemed to be sustainable in many cases, and it is asserted that their presence must not be used as a means to preclude the realisation of taller and more dense developments. Ultimately, the referenced NPOs all combine in support of the NPF's overarching NSO of 'Compact Growth'.

#### **National Policy Objectives of Project Ireland 2040: National Planning Framework**

**NPO 3a** – *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."*

**NPO 3c** – *"Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints."*

**NPO 4** – *"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

**NPO 5** – *"Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."*

**NPO 6** – *"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."*

**NPO 11** – *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

**NPO 33** – *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*



**NPO 35 – “Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”**

The Development Plan’s density standards are set out in its Table 6.1, which it states are “*per the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).*” For ‘Large Towns’, which includes Blessington, the Plan sets the following:

- *“Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.*
- *Outer Suburban / Greenfield Sites: Minimum density of 35 – 50 dwellings per hectare.*
- *Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.”*

Additionally, the Plan also references Circular NRUP 02/2021, which encouraged Councils to pragmatically and flexibly apply the density standards of the 2009 Guidelines. However, we note that these Guidelines have now been revoked; supplanted by the Compact Growth Guidelines in January 2024.

The Compact Growth Guidelines define settlements by their size and position in regional and county hierarchies. It defines one such category as ‘Key Towns and Large Towns (5,000+ population)’, remarking that: “*Key Towns are identified in the RSEs, while Large Towns are identified at a county level.*” Blessington has a population (as of 2022) of 5,611 people and is listed as a ‘Large Town’ in the Development Plan’s settlement hierarchy.

Table 3.5 of the Guidelines provides the quantitative density standards for such settlements:

*“Key Town / Large Town - Centre and Urban Neighbourhood*

*The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.*

*Key Town / Large Town - Suburban/Urban Extension*

*Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at ‘accessible’ suburban / urban extension locations (as defined in Table 3.8).”*

Based on the location, context and zoning of the subject site, a case could be made for defining the subject site as being in a ‘Centre or Urban Neighbourhood’ or an ‘Suburban/Urban Extension’.

The new Guidelines provide further guidance relating to ‘Refining Density’ to take account of specific characteristics and constraints of individual sites. This additional requirement is intended to incorporate the nuances of individual sites, pushing their densities up and down

within the ranges set by the Guidelines. 'Refining Density' is comprised of 2 No. steps, which require consideration of: (1) accessibility; and (2) character, amenity and natural environment.

Whilst the site is not markedly constrained by character, amenity and natural environment factors (setting aside archaeological features which have been incorporated into open space areas and prevailing moderate building heights), it is technically within a 'Peripheral' location<sup>19</sup> due to the low frequency of "urban bus services". In such locations, the Guidelines state that "...planning authorities should encourage... densities below the mid-density range at peripheral locations." This would push the density into the lower 30–40 uph range. However, this would be an inefficient and unsustainable density at the site for the following reasons:

- It is infill in nature;
- It is a relatively unconstrained site;
- It is within short walking and cycling distances of a suite of key assets, including childcare, primary and post-primary schools, shops, employment opportunities, community facilities and sports clubs;
- It is within walking distance of Blessington Town Centre; and
- It is partially comprised of a portion of TC-zoned land.

**Therefore, there is a strong case to be made for proposing an appropriate density within the upper end range of 30–50 dph for Suburban/Urban Extension locations, or in the lower end range of 40–100 dph for Centre and Urban Neighbourhood locations.**

Ultimately, however, the densities in the Guidelines are a 'Policy and Objective' and not an SPDR. Consequently, that the Development Plan still takes precedence in this respect, as is alluded to in the *LRD Meeting Planner's Report*<sup>20</sup>. Therefore, it is necessary to comply with the Plan's 'Public Transport Corridor' density standard: "Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.", as the majority of the site is within this range.

#### 7.4.2 Proposing and Calculating Density

The 'gross' densities of the development are set out in Table 7.6 below, based on Deady Gahan Architects' *Proposed Site Plan*. These are broken out into the main residential site and the mixed-use site. Evidently, the Development Plan's minimum density requirement of 50 dph is exceeded.

| Site             | Net Developable Area (Ha) | Units (No.) | Density (dph) |
|------------------|---------------------------|-------------|---------------|
| Main Residential | 4.84                      | 233         | 48.1          |
| Mixed-Use        | 0.51                      | 36          | 70.6          |
| Total            | 5.35                      | 269         | 50.3          |

**Table 7.6: Proposed density at the subject site**

**Source: Deady Gahan Architects and Thornton O'Connor Town Planning (2024)**

However, we note that the Compact Growth Guidelines provide a very explicit methodology for calculating 'net' density. We have conducted the calculation in Tables 7.7 and 7.8 below for completeness. Be advised that Table 7.7 calculates the density based on what the Applicant and

<sup>19</sup> Per the Guidelines: "Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages."

<sup>20</sup> That report states: "In the application of density standards and the assessment of applications, Table 6.1 Density Standards of the 2022-2028 County Development Plan will be applied. Cognisance shall also be taken of the Sustainable Residential Development and Compact Settlements Guidelines 2024 and Circular letter NRUP 02/2021."

Design Team have defined as the residential and mixed-use sites, while Table 7.8 calculates the density based on the Town Centre and Proposed Residential land-use zoning designations as were prescribed by the LAP.

| Stage | Metric                                     | Calculation | Residential Site | Mixed-Use Site | Total Site |
|-------|--|-------------|------------------|----------------|------------|
| A     | Net Site Area                              |             | 48,400.0         | 5,100.0        | 53,500.0   |
| B     | Total GFA                                  | C+D         | 20,283.2         | 2,935.9        | 23,219.1   |
| C     | Residential GFA                            |             | 20,283.2         | 2,536.9        | 22,820.1   |
| D     | Non-Residential GFA                        |             | -                | 399.0          | 399.0      |
| E     | Residential GFA as Proportion of Total GFA | C/B         | 100.0%           | 86.4%          | 98.3%      |
| F     | Pro Rata Site Area                         | AxE         | 48,400.0         | 4,406.9        | 52,580.6   |
| G     | Number of Dwellings                        |             | 233              | 36             | 269        |
| H     | Net Residential Density (dph)              | G/F/10000   | 48.1             | 81.7           | 51.2       |

**Table 7.7:** Calculation of density using the methodology prescribed by the Compact Growth Guidelines – based on the ‘residential’ and ‘mixed-use’ sites

**Source:** Thornton O’Connor Town Planning (2024)

| Stage | Metric                                     | Calculation | Residential Zoned | Town Centre Zoned | Total Site |
|-------|--|-------------|-------------------|-------------------|------------|
| A     | Net Site Area                              |             | 42,600.0          | 10,900.0          | 53,500.0   |
| B     | Total GFA                                  | C+D         | 18,055.1          | 5,164.0           | 23,219.1   |
| C     | Residential GFA                            |             | 18,055.1          | 4,765.0           | 22,820.1   |
| D     | Non-Residential GFA                        |             | -                 | 399.0             | 399.0      |
| E     | Residential GFA as Proportion of Total GFA | C/B         | 100.0%            | 92.3%             | 98.3%      |
| F     | Pro Rata Site Area                         | AxE         | 42,600.0          | 10,057.8          | 52,580.6   |
| G     | Number of Dwellings                        |             | 206               | 63                | 269        |
| H     | Net Residential Density (dph)              | G/F/10000   | 48.4              | 62.6              | 51.2       |

**Table 7.8:** Calculation of density using the methodology prescribed by the Compact Growth Guidelines – based on the ‘Proposed Residential’ and ‘Town Centre’ zonings

**Source:** Thornton O’Connor Town Planning (2024)

In both instances above, the total site density exceeds the 50 dph minimum set by the Development Plan and as sought in the LRD Opinion’s point (ii). Additionally, the density falls within the lower end of the range set in the Compact Growth Guidelines for development in ‘Centre and Urban Neighbourhood’ locations (40–100 dph), which we have previously contended is appropriate owing to the less frequent, lower capacity public transport serving the site and the town generally.

Following feedback received at each of the consultation meetings with the Council, the Applicant has endeavoured to increase the density of the development. The changes in total net density are presented in Table 7.9 below. The increase from the LRD Meeting is due to the increased floor area committed to the non-residential uses and the addition of 4 No. later living units as a fifth storey to the mixed-use block in the southern portion of the site.

| Stage                             | Density (dph) |
|-----------------------------------|---------------|
| Section 247 – PPC                 | 42.7          |
| Section 32C – LRD Meeting         | 49.6          |
| Section 34 – Planning Application | 51.2          |

**Table 7.9: Residential density of the evolving development proposal at Section 247, Section 32C and Application stages**

**Source:** Deady Gahan Architects (2023 and 2024) and Thornton O'Connor Town Planning (2023 and 2024)

The expression of density and built-form on-site has also been considered, with greater emphasis placed on defining the public interfacing built-edges of the site, most notably the southern, south-western and north-western frontages where 3–5 No. storeys are proposed. This provides a strong form to support placemaking and a transition in height from the mixed-use development at Dunnes Stores to the south-east.

Importantly, density on the southern portion of the site has been given a strong focus, due to: (1) its proximity to the core of the town and the mix of uses, (2) its adjacency to the larger-scale development of the 5 No. storeys of the Dunnes Stores mixed-use scheme to the south-east and (3) the zoning of that portion of the site at Town Centre in the LAP. As shown in Tables 7.7 and 7.8, in both scenarios where the overall site is subdivided based on principal uses or zoning designations, the density on the mixed-use/town centre parcel is markedly higher (81.7 dph and 62.6 dph respectively). Thereby positively responding to the above 3 No. key points.

Consequently, we are firmly of the opinion that the density and scale of development at the subject site, including its distribution with higher levels at the southern end are appropriate and wholly align with both the Development Plan and Compact Growth Guidelines.

## 7.5 Separation Distances

Providing adequate separation distances between opposing above ground level windows is appropriate in order to achieve high-quality living environments and to protect existing and future residential amenity and privacy. On this matter, Section 3.1.3 (Privacy) of Appendix 1 of the Development Plan provides quantitative guidance, stating:

*"A separation of 22m will normally be required above ground level between opposing windows serving private living areas (particularly bedrooms and living rooms). However, this rule shall be applied flexibly: the careful positioning and detailed design of opposing windows can prevent invasion of privacy even with short back-to-back distances. Windows serving halls and landings do not require the same degree of privacy as say balconies and living rooms..."*

However, we are mindful of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, which include Specific Planning Policy Requirement (SPPR) 1 ('Separation Distances'):

*"It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between*

*opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces. There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.*

*In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

Informed by the requirements of the Guidelines, the Design Team propose a scheme that has adopted 16 m as the **minimum** separation distance between opposing upper level windows serving habitable rooms (e.g. Unit Nos. 208 and 230). This approach delivers high-quality living spaces and private external amenity, whilst achieving more sustainable, compact development.

Where opposing rear and/or side elevation are less than 16 m, their dwellings have been designed without opposing fenestration at the points of interface or with windows serving non-habitable rooms only (e.g. Unit Nos. 82 and 77/78).

Please refer to DGA's *Proposed Site Plan* drawing and the suite of housing floor plans for further details.

## 7.6 Dwelling Mix

We note from the content of the Development Plan and its *Interim Housing Strategy* that no *Housing Needs Demand Assessment* (HNDA) has been prepared by Wicklow County Council due to notice of the review/preparation of the Development Plan being given prior to the issuance of Circular No. 14/2021. Therefore, no prescriptive guidance with respect to dwelling/housing mix is established. However, Objective HS12 of the *Interim Housing Strategy* states:

*"To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range unit types available to suit the needs of the various households in the county."*

The proposed development comprises of the mix contained in Table 7.10 (below). The approach taken has been to provide a range of sizes so as to provide variety in terms of housing types and future occupants. This will augment the existing housing stock in Blessington. The 1-bed and 2-bed units will likely cater for single occupants and 'right-sizers', whereas the larger 3-bed and 4-bed units will accommodate larger and established families, or occupants with a preference for more space. The benefit of the proposed mix of units is that it will attract a wide range of cohorts of future residents in terms of demographic and socio-economic profiles, that would not be able to access a unit in a scheme with a narrow range of dwelling types and sizes. By extension this facilitates greater social interaction and integration, and community building.

| Unit Size    | Main Residential Area | Mixed-Use Area | Total (No.) | Total (%)     |
|--------------|-----------------------|----------------|-------------|---------------|
| 1-bed        | 24                    | 12             | 36          | 13.4%         |
| 2-bed        | 103                   | 24             | 127         | 47.2%         |
| 3-bed        | 94                    | 0              | 94          | 34.9%         |
| 4-bed        | 12                    | 0              | 12          | 4.5%          |
| <b>Total</b> | <b>233</b>            | <b>32</b>      | <b>269</b>  | <b>100.0%</b> |

**Table 7.10: Proposed dwelling mix**

**Source: Deady Gahan Architects (2023)**

To provide comfort to the Council specifically in relation to the apartment units within the development, we note that Specific Planning Policy Requirement (SPPR) 1 of the Apartment Design Guidelines states:

*"Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)."*

Based on the inclusion of 24 No. 1-bed duplex apartments amongst the 48 No. 'standard' housing apartments units and 12 No. 1-bed apartments amongst the 24 No. later living apartment units, there are a total of 36 No. 1-bed apartments, equating to 50.0% of the total apartments. Therefore, **the 50% limit is not exceeded** and the development is in accordance with SPPR1.

While the dwelling mix was noted as being acceptable, the Planning Authority did request that the provision of additional 1-bed units be investigated during the Section 247 meeting and in the *LRD Opinion Planner's Report*. In relation to the latter, we note the following reference:

*"It was noted during the meeting that the proportion of 1 bed units is relatively low and consequently it is not clear that it would allow for an appropriate mix, in the interests of choice and meeting local housing need. Justification for the mix should be included as part of the planning application."*

This led to the inclusion of *LRD Opinion* item (b):

*"Any forthcoming application should demonstrate that it would provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to provide choice and meet local housing need, in accordance with CPO 6.27 of the CDP 2022-2028."*

For clarity, CPO 6.27 of the Development Plan states:

*"To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county, in accordance with the Design Standards for new Apartments, Guidelines for Planning Authorities (2020)."*

As requested by the Council, the Design Team considered 1-bed unit provision as part of a wider series of changes to the development. The total number has now increased between the Section 247 meeting and this Application from 32 No. to 36 No. units (Table 7.11). **In accordance with**



**SPPR 1 and CPO 6.27, this is the maximum number of such units that can be delivered as apartment units as it totals 50% of all proposed apartments.** Proposing further 1-bed units would necessitate changes to the proposed houses; which in this instance, would be an inefficient, underutilisation of the site as they would likely be single-storey structures, thereby conflicting with the Planning Authority's preference for a more dense and taller development on-site.

| Stage                             | No. 1-bed Units |
|-----------------------------------|-----------------|
| Section 247 – PPC                 | 32              |
| Section 32C – LRD Meeting         | 33              |
| Section 34 – Planning Application | 36              |

**Table 7.11: Number of 1-bed units the development proposal at Section 247, Section 32C and Application stages**

**Source:** Deady Gahan Architects (2023 and 2024) and Thornton O'Connor Town Planning (2023 and 2024)

Further to the above, we have undertaken a review of dwelling sizes (based on numbers of units) based on the Central Statistics Office's (CSO) census data from 2022. This is intended to illustrate that the proposed development will "...provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county", as sought by CPO 6.27.

The data is not available at settlement level. However, we have collated it based on the 3 No. Electoral Divisions (EDs) that define Blessington and its hinterland (Blessington and Burgage EDs in County Wicklow and Newtown ED in County Kildare) (Table 7.12).

| No. Bedrooms | Blessington Units | Newtown Units | Burgage Units | Total Units | Existing Dwelling Mix | Proposed Dwelling Mix |
|--------------|-------------------|---------------|---------------|-------------|-----------------------|-----------------------|
| 1-bed        | 70                | 2             | 10            | 82          | 3.4%                  | 13.4%                 |
| 2-bed        | 336               | 39            | 29            | 404         | 17.0%                 | 47.2%                 |
| 3-bed        | 551               | 98            | 303           | 952         | 39.9%                 | 34.9%                 |
| 4-bed        | 400               | 108           | 208           | 716         | 30.0%                 | 4.5%                  |
| >4-bed       | 123               | 43            | 63            | 229         | 9.6%                  | 0.0%                  |
| Total        | 1,480             | 290           | 613           | 2,383       | 100%                  | 100.0%                |

**Table 7.12: Dwelling sizes within the 3 No. Electoral Divisions within with the settlement of Blessington is located and the dwelling mix of the proposed development**

**Source:** CSO (2023), Deady Gahan Architects (2024) and Thornton O'Connor Town Planning (2024)

As shown in Table 7.12, there is a relatively considerable proportion of existing larger dwellings (3-bed and bigger); they account for 79.6% of the total. This contrasts markedly with the dwelling mix of the proposed development, which includes less than half as many units in relative terms (39.4% of total units). The smaller units (1-bed and 2-bed) account for 20.4% of existing dwellings, but 60.6% of the proposed dwellings. **Therefore, the proposal will support a balancing and broadening of the local housing stock; shifting away from the dominance of larger units to smaller alternatives.** Importantly, this will increase the range of options open to existing and future residents:

- Supporting rightsizing in later stages of life;

- Providing smaller dwellings for young adults and young families who do not require multiple bedrooms;
- Providing smaller and larger units to match the personal preferences and buying power of prospective residents of all ages, socio-economic backgrounds and lifecycle stages.

Further to the above, the increase in smaller units is reflective of the reduction in household sizes that have been occurring nationally<sup>21</sup> and are envisaged for the future<sup>22</sup>; thereby warranting their inclusion.

We are also of the opinion that dwelling sizes are not the only consideration in terms of appropriate housing. Dedicated typologies are also necessary. **Therefore, the inclusion of the dedicated later living dwellings – which will be maintained as such – plays an important role in broadening housing stock in the town, facilitating the transition between wholly independent, ‘standard’ housing and assisted living or nursing home care.**

**We contend that the unit mix and the housing typology are appropriate, and both feasible and viable to deliver. Based on known market preferences, existing stock and changing demographic profiles in the area, it is anticipated that the proposed dwelling mix is warranted.**

## 7.7 Dwelling Design and Amenity

The following Sub-Sections detail and assess several of the key dwelling design considerations, notably in relation to internal areas, private amenity space, aspect and floor-to-ceiling heights.

### 7.7.1 Internal Floor Areas

For the apartment units (standard duplex and LLUs), the internal floor area standards are set by the Apartment Design Guidelines, as discussed in Section 6.3 above. They also state that in addition to the minimum floor areas:

*"The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%)."*

Table 7.13 below sets out the minimum floor areas required for the various apartment units based on their size and the areas proposed for each. As is evident, **all units exceed the minimum floor area requirements** by 10%. Therefore, the proposed units are in compliance with the minimum floor area standards applicable to apartments.

<sup>21</sup> Despite declines having stalled in recent years due to the covid pandemic, strong population growth and limited housing delivery.

<sup>22</sup> The NPF expects this to decline to 2.5 No. persons per household by 2040.

| Apartment Type | No. Bedrooms     | Minimum Required Area (sq m) | Area Proposed (sq m) | Exceedance of Minimum |
|----------------|------------------|------------------------------|----------------------|-----------------------|
| LM1/3/5/7/9    | 1-bed            | 45                           | 57.1                 | 26.9%                 |
| LM2/4/6/8/10   | 3-bed            | 90                           | 118.7                | 31.9%                 |
| X (LLU)        | 1-bed            | 45                           | 53.3                 | 18.4%                 |
| Y (LLU)        | 2-bed (4-person) | 73                           | 80.8–81.5            | 10.7–11.6%            |

**Table 7.13: Minimum floor area standards for apartment units and areas proposed**

**Source:** *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023) and DGA (2024)*

For the houses, the minimum internal floor areas are set by *Quality Housing for Sustainable Communities* (2007). The "target" areas required by these Guidelines are set alongside the house units and their floor areas in Table 7.14 (below). **As is evident, the floor areas are exceeded in all instances.**

| Dwelling Type | No. Bedrooms | No. Persons | No. Storeys | Target Required Area | Area Proposed | Exceedance of Minimum % |
|---------------|--------------|-------------|-------------|----------------------|---------------|-------------------------|
| E1            | 2            | 4           | 2           | 70                   | 73.3          | 4.7%                    |
| D1            | 3            | 4           | 2           | 83                   | 91.7          | 10.5%                   |
| F1            | 3            | 5           | 2           | 92                   | 102.6         | 11.5%                   |
| F2            | 3            | 5           | 2           | 92                   | 104.1         | 13.2%                   |
| F3            | 3            | 5           | 2           | 92                   | 104.1         | 13.2%                   |
| F4            | 4            | 7           | 2           | 120                  | 154.0         | 28.3%                   |
| F5            | 4            | 7           | 3           | 120                  | 156.2         | 30.2%                   |
| F7            | 4            | 7           | 3           | 120                  | 156.2         | 30.2%                   |
| A1 (LLU)      | 2            | 4           | 2           | 80                   | 84.2          | 5.3%                    |
| A2 (LLU)      | 2            | 4           | 2           | 80                   | 84.2          | 5.3%                    |
| J1 (LLU)      | 2            | 4           | 1           | 70                   | 81.7          | 16.7%                   |
| J2 (LLU)      | 2            | 4           | 1           | 70                   | 81.7          | 16.7%                   |
| K1 (LLU)      | 2            | 3           | 1           | 60                   | 68.1          | 13.5%                   |
| K2 (LLU)      | 2            | 3           | 1           | 60                   | 68.1          | 13.5%                   |

**Table 7.14: Minimum floor area standards for apartment units and areas proposed**

**Source:** *Quality Housing for Sustainable Communities* (2007) and DGA (2024)

## 7.7.2 Universal Design

The Development Plan requires the inclusion of Universal Design principles in the design of development. This is evident in the following objective CPO 6.8:

*"Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time and in particular to require that all new residential developments in excess of 20 residential units to provide a minimum 5% universally designed homes in accordance with the requirements of 'Building for Everyone: A Universal Design Approach and the Universal Design Guidelines for Homes in Ireland (2015)."*

According with this objective, the 1-bed ground floor level duplex apartments (standard housing) (24 No.), the single-storey LLU houses (7 No.) and the LLU apartments (24 No.) have been designed in accordance with universal design principles. These 55 No. units (20.4% of the total)

are designed to allow for ease of access, internal movement and habitation for persons with mobility impairments. They also include key features to allow for their adaptation and reconfiguration (e.g. 'soft' walls).

### 7.7.3 Private Amenity Space

The private amenity spaces have been designed as balconies and terraces for the apartments and as gardens or terraced areas for the houses. The quantitative standards for the former are set by the Apartment Design Guidelines and for the latter by the Compact Growth Guidelines. SPPR 2 for the latter states:

*"It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:*

- 1 bed house 20 sq.m*
- 2 bed house 30 sq.m*
- 3 bed house 40 sq.m*
- 4 bed + house 50 sq.m*

***A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.***

***Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).***

*For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.*

*In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

The standards for the units, based on their size, are detailed in Table 7.15 alongside the proposed private open space areas for the various dwelling types. The balconies/terraces for the apartment units are orientated in all directions and exceed the minimum standards. The proposed open space areas for the houses vary in size due to the site layout, however, they are detailed in DGA's enclosed documentation, which indicate that the minimum standards are met and exceeded.

**In respect of the private amenity space for the LLU houses, we direct the Council to Section 7.9 below for further commentary and justification.**

The apartment balconies/terraces are all at least 1.5 m deep. The ground floor level terraces are proposed to be enclosed with hedging to define their extents, and to provide privacy and a sense of defensible space.

| Dwelling Type | Dwelling Style       | No. Bedrooms     | Relevant Standard (sq m) | Area Provided (sq m) |
|---------------|----------------------|------------------|--------------------------|----------------------|
| E1            | House (Standard)     | 2                | 30                       | Varies               |
| D1            | House (Standard)     | 3                | 40                       | Varies               |
| F1            | House (Standard)     | 3                | 40                       | Varies               |
| F2            | House (Standard)     | 3                | 40                       | Varies               |
| F3            | House (Standard)     | 3                | 40                       | Varies               |
| F4            | House (Standard)     | 4                | 50                       | Varies               |
| F5            | House (Standard)     | 4                | 50                       | Varies               |
| F7            | House (Standard)     | 4                | 50                       | Varies               |
| A1            | House (LLU)          | 2                | 30                       | 15.4                 |
| A2            | House (LLU)          | 2                | 30                       | 15.4                 |
| J1            | House (LLU)          | 2                | 30                       | 39.3                 |
| J2            | House (LLU)          | 2                | 30                       | 39.3                 |
| K1            | House (LLU)          | 2                | 30                       | 32.9                 |
| K2            | House (LLU)          | 2                | 30                       | 32.9                 |
| LM1/7/9       | Apartment (Standard) | 1                | 5                        | 28.8                 |
| LM3/5         | Apartment (Standard) | 1                | 5                        | 27.4                 |
| LM2/8/10      | Apartment (Standard) | 3                | 9                        | 9.1                  |
| LM4/6         | Apartment (Standard) | 3                | 9                        | 9.4                  |
| 1-bed LLU     | Apartment (LLU)      | 1-bed            | 5                        | 8                    |
| 2-bed LLU     | Apartment (LLU)      | 2-bed (4-person) | 7                        | 8                    |

**Table 7.15: Minimum private amenity space standards and proposals for houses apartment units**

**Source:** *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023), Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024) and DGA (2024)*

#### 7.7.4 Aspect

In relation to the aspect and orientation of units, the Development Plan relies upon the guidance of Specific Planning Policy Requirement 4 of the Apartment Design Guidelines, which states:

*"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:*

- (i) *A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.*
- (ii) ***In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.***
- (iii) *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.” [emphasis added]*

Additional text in the Guidelines notes that single aspect units should preferably face east, south or west (north-orientated units should ideally face attractive amenity features) and 3-bed units should generally be dual aspect.

Based on the subject site’s location adjacent to the centre of Blessington, it could be argued as being in a “central and accessible urban” location. However, we have opted to use the Guidelines’ target of 50%.

Of the apartments:

- All 48 No. of the ‘standard’ duplex apartments are dual/triple aspect; and
- 16 No. of the 24 No. LLUs apartments are dual/triple aspect.

**Therefore, 64 No. of the 72 No. apartments units – 88.9% – are dual or triple aspect, exceeding the minimum requirements of the Guidelines.**

Positively, all of the proposed houses are dual or triple aspect and if included in the calculation, **results in a total of 261 No. or 97.0% of units being dual or triple aspect.**

Therefore, the proposed dwellings will have a high level of residential amenity as bright and spacious living environments.

#### 7.7.5 Floor-to-Ceiling Heights

The Apartment Design Guidelines provide guidance in respect of floor-to-ceiling heights, which state ground floor apartments should have minimum floor-to-ceiling heights of at least 2.7 m (SPPR 5), with a height of at least 2.4 m at above ground levels.

As shown on the drawings prepared by DGA, floor-to-ceiling heights of 2.7 m are proposed for the ground floor level duplex apartments units. Above ground floor level internal heights in the mixed-use building and the duplexes are proposed at 2.7 m. Therefore, the proposed development complies with the applicable standards relating to internal floor-to-ceiling heights, ensuring the delivery of spacious, well-ventilated and attractive dwellings.

#### 7.7.6 Storage

The Development Plan defers to the Apartment Design Guidelines for storage requirements in apartments. Per the documentation prepared by DGA, and displayed in Table 7.16, the relevant minimum standards for the proposed apartments have been met or exceeded. No single storage



space exceeds 3.5 sq m, with proposed spaces excluding hot press areas and kitchen storage and independent of main habitable room areas.

| Apartment Type | No. Bedrooms     | Minimum Required Area (sq m) | Area Proposed (sq m) |
|----------------|------------------|------------------------------|----------------------|
| LM1/3/5/7/9    | 1-bed            | 3                            | 3.4                  |
| LM2/4/6/8/10   | 3-bed            | 9                            | 9                    |
| X (LLU)        | 1-bed            | 3                            | 3.4                  |
| Y (LLU)        | 2-bed (4-person) | 5                            | 6.5                  |

**Table 7.16: Minimum internal storage space standards for apartment units and proposed internal storage space by dwelling type**

**Source:** *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023) and DGA (2024)*

For the proposed houses, the *Quality Housing for Sustainable Communities – Best Practice Guidelines* are used to determine the storage requirement. As demonstrated in the documentation prepared by DGA, and displayed in Table 7.17, the relevant minimum standards for the proposed houses have been met or exceeded.

| Dwelling Type | No. Bedrooms | Relevant Standard (sq m) | Storage Provided (sq m) |
|---------------|--------------|--------------------------|-------------------------|
| E1            | 2            | 3                        | 4                       |
| D1            | 3            | 4                        | 4.6                     |
| F1            | 3            | 5                        | 5.4                     |
| F2            | 3            | 5                        | 5.7                     |
| F3            | 3            | 5                        | 5.5                     |
| F4            | 4            | 6                        | 6.9                     |
| F5            | 4            | 6                        | 8                       |
| F7            | 4            | 6                        | 8                       |
| A1 (LLU)      | 2            | 4                        | 5.9                     |
| A2 (LLU)      | 2            | 4                        | 5.9                     |
| J1 (LLU)      | 2            | 4                        | 5                       |
| J2 (LLU)      | 2            | 4                        | 5                       |
| K1 (LLU)      | 2            | 3                        | 3                       |
| K2 (LLU)      | 2            | 3                        | 3                       |

**Table 7.17: Minimum internal storage space standards for house units and proposed internal storage space by dwelling type**

**Source:** *Quality Housing for Sustainable Communities – Best Practice Guidelines (2007) and DGA (2024)*

### 7.7.7 Daylight and Sunlight

The natural lighting of proposed units is important to create bright, enjoyable and energy efficient environments for residents. As part of 3D Design Bureau's *Daylight and Sunlight Assessment Report*, focus was placed on the performance of the proposed development (and possible impacts on adjacent properties). This Report is included under separate cover and principally used The Building Research Establishment's (BRE) *Site Layout Planning for Daylight*

and *Sunlight: A guide to good practice* (BRE 209 – 3<sup>rd</sup> edition / 2022 edition) for its assessments and analyses.

The 72 No. assessed apartment and apartments units perform very well in terms of Spatial Daylight Autonomy (SDA):

- 99% of assessed rooms (226 No. of 228 No.) are compliant in a scenario without trees;
- 98% of assessed rooms (223 No. of 228 No.) are compliant in a scenario with "*trees in winter state*"; and
- 97% of assessed rooms (222 No. of 228 No.) are compliant in a scenario with "*trees in summer state*".

These SDA results are based on BRE 209 targets of:

- >50% of kitchens achieving at least 200 lux;
- >50% of living rooms achieving at least 150 lux; and
- >50% of bedroom areas achieving at least 100 lux over at least half of the daylight hours<sup>23</sup>.

The assessment of the proposed 72 No. units' 'Sunlight Exposure' (SE) was undertaken and revealed that:

- In a scenario with "*trees as opaque objects*", 96% of units are compliant (69 No. of 72 No. units); and
- In a scenario with "*without deciduous trees*", 97% of units are compliant (70 No. of 72 No. units).

Importantly for the quality of the various open space areas, 3D Design Bureau's analysis indicates that all 8 No. spaces are compliant with the BRE target of securing at least 2 hours of direct sunlight across at least 50% of their area on March 21<sup>st</sup>. Performance of these spaces is summarised in Table 7.18 below.

| Open Space Area (per 3DDB's <i>Daylight and Sunlight Assessment Report</i> and DGA's <i>Open Space Allocation Drawing</i> ) | Area Capable of Receiving at Least 2 Hours of Sunlight on 21 <sup>st</sup> March |
|---|--|
| 1   | 95.46%   |
| 2   | 99.22%   |
| 3   | 99.10%   |
| 4   | 97.14%   |
| 5   | 100.00%  |
| 6   | 97.70%   |
| 7   | 99.39%   |
| 8   | 100.00%  |

**Table 7.18: Sun ground performance of proposed open space areas**

**Source:** 3D Design Bureau (2024)

<sup>23</sup> Where rooms serve more than one function, the higher SDA target value is taken.

## 7.8 Parking

Parking for car and cycles is an important design consideration for development as a means to support the mobility of future residents and to do so in healthy and sustainable ways. The following Sub-Sections outline the standards and proposals relating to car and cycle parking.

### 7.8.1 Car Parking

National, regional and local planning and development policy seeks to firmly reduce the level of car parking provided in residential developments, with emphasis placed on using active and public modes of transport as sustainable alternatives. However, lower levels of car parking provision must be balanced against the need to protect and maintain resident mobility, especially in areas with fewer and less frequent public transport options.

The car parking standards for residential development in County Wicklow are set out in Table 2.3 of Appendix 1 of the Development Plan:

- **1-bed and 2-bed dwellings:** 1.2 No. spaces per unit
- **3-bed and 4-bed dwellings:** 2 No. spaces per unit

The Development Plan states that "...in locations where public transport and parking enforcement are available...", the above standards will be considered as 'maximum'<sup>24</sup>. Given the availability of public transport in Blessington (see Section 2.3.2 above) and that parking can be enforced by a future management company, the above standards are considered herein as 'maximum'.

However, the Compact Growth Guidelines set a maximum of 2 No. spaces per dwelling<sup>25</sup> in "intermediate and peripheral locations" (within which the site is located)<sup>26</sup>. This standard is set by SPPR 3 (Car Parking) and facilitates a greater overall provision than the Development Plan. **As an SPPR, the standard supplants those of the Development Plan. However, we have adopted the latter's general approach of providing more spaces for larger dwellings and fewer spaces for smaller dwellings.**

The maximum standards and proposed rates of provision for the 269 No. 'standard' residential units and LLUs are displayed in Table 7.19 below.

<sup>24</sup> Where public transport and parking enforcement are not available, the Development Plans states that the standards would be considered as "minimum standards."

<sup>25</sup> Which excludes "...bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces."

<sup>26</sup> **Intermediate location:** "Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service." **Peripheral location:** "Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages."

| Dwelling Type | Dwelling Size | Parking Rate | No. Units | Max. Spaces | Provision Rate | Provision |
|---------------|---------------|--------------|-----------|-------------|----------------|-----------|
| Houses        | 2-bed         | 2            | 103       | 206         | 1              | 103       |
|               | 3-bed         | 2            | 70        | 140         | 2              | 140       |
|               | 4-bed         | 2            | 12        | 24          | 2              | 24        |
| Duplexes      | 1-bed         | 2            | 24        | 48          | 1              | 24        |
|               | 3-bed         | 2            | 24        | 48          | 1              | 24        |
| LLUs          | 1-bed         | 2            | 9         | 24          | 0.45           | 5         |
|               | 2-bed         | 2            | 23        | 48          | 0.45           | 11        |
| Total         |               |              | 269       | 538         |                | 331       |

**Table 7.19:** Car parking standards (maximum per Compact Growth Guidelines) and provision for the proposed development (LLUs have been rounded)

**Source:** *Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities*, Deady Gahan Architects (2024) and Thornton O'Connor Town Planning (2024)

The overall maximum rate of car parking provision for the principal residential and LLUs of 538 No. spaces is **not** exceeded, with just 331 No. spaces proposed. This equates to an overall residential car parking ratio of 1.23 No. spaces per dwelling, although this is nuanced to 0.88 No. space per dwelling for 1-bed and 2-bed units and 1.77 No. spaces per dwelling for 3-bed and 4-bed units.

**Given the site's proximity to the town centre and a host of important local services, facilities and amenities, and the availability of public transport options, we contend that the proposed rate of car parking provision is appropriate both to meet the mobility needs of future residents and to encourage the use of alternative, sustainable modes of transport in accordance with policy.**

The distribution and allocation of car parking spaces is demonstrated on DGA's drawing titled *Parking, Bins and Bikes Scheme*.

We note the need to allocate 5% of spaces for mobility impaired persons. Accordingly, a total of 4 No. or 5% of the communal/unallocated spaces have been assigned as such.

For the 399 sq m of non-residential uses in the 3 No. units in the mixed-use block, we note the following standards (deemed to be **maximum** due to the availability of public transport, management company and proximity to the town centre) and possible provision based on the size/detail of the spaces:

- **"Clinics / medical practices"** – 2 No. spaces per consultant – 12 No. spaces (approx.).
- **"Restaurant dining room"** (as a proxy for the café use) – 10 No. spaces per 100 sq m of GFA – 6 No. spaces (approx.).
- **"Other retail"** – 4 No. spaces per 100 sq m floor area – 4 No. spaces (approx.).

Therefore, the maximum car parking provision for the non-residential uses is 22 No. spaces. However, given the centrality of the site and its connectivity to the core of the town, as well as the complementary of these uses, we are of the opinion that there will be a reduced need to drive to avail of their services and amenities.

Consequently, 10 No. 'commercial' car parking spaces are proposed within the development. These will be associated with the medical centre, café and pharmacy and appropriately managed by a future management entity.

## 7.8.2 Cycle Parking

Cycle parking features as SPPR 4 in the Compact Growth Guidelines (see above), thereby supplanting the Development Plan:

*"It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.*

*The following requirements for cycle parking and storage are recommended:*

- (i) **Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied.** Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.
- (ii) **Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.** **[emphasis added]**

As an SPPR, the above applies to all house and apartments units. However, visitor parking at the rate of 1 No. space per dwelling as advocated for in the Apartment Design Guidelines has been adopted to meet this requirement.

As facilitated by SPPR 4 above, all of the end-of-terrace, semi-detached and detached houses have adequate private garden spaces and access to same thereby allowing for safe and easy cycle parking thereat. Therefore, their cycle parking requirement is addressed within their curtilage.

Based on the dwelling mix, the cycle parking requirement and provision for the remaining units is as follows:

### **Apartments (upper own door access duplex apartments and the LLU apartment units)**

- **1-bed (LLU apartment):** 1.5 No. spaces per dwelling x 12 No. units = 18 No. spaces
- **2-bed (LLU apartment):** 2.5 No. spaces per dwelling x 12 No. units = 30 No. spaces
- **3-bed (upper own door access duplex apartment):** 3.5 No. spaces per dwelling x 24 No. units = 84 No. spaces
- **Total requirement:** 132 No. spaces
- **Total proposed:** 136 No. spaces

These spaces are proposed in 6 No. communal cycle stores (22–26 No. spaces in each) dispersed throughout the site, but proximate to the relevant units, as shown on DGA's *Parking, Bins and Bikes Scheme* drawing. This configuration will ensure the safe storage of cycles with the benefit of passive surveillance. They are also sited so as to facilitate easy arrivals and departures.

#### Standard houses, LLUs and ground floor level own door access duplex apartment

- **1-bed (LLU apartment):** 1.5 No. spaces per dwelling x 24 No. units = 36 No. spaces
- **2-bed (standard houses and LLUs):** 2 No. spaces per dwelling x 115 No. units = 230 No. spaces
- **Total requirement:** 266 No. spaces
- **Total proposed:** 278 No. spaces

To meet these requirements, the dwellings are provided with cycle stores to their fronts with 2 No. spaces in each. These 139 No. stores deliver 278 No. spaces. These stores are within direct line of sight of the dwelling, ensuring they benefit from passive surveillance, and are enclosed to prevent theft and protect from inclement weather.

For the 3 No. non-residential uses, a total of 8 No. spaces in 4 No. Sheffield stands in the plaza beside the mixed-use block are proposed. Given the small scale of the units and their expected local catchment, this level of provision is considered to be adequate.

## 7.9 Landscaping and Open Space

Open space in a general sense is categorised as public open space, communal amenity space and private amenity space. Public open space is publicly accessible land that future residents, as well as the existing local community or passers-by, can use freely. Communal amenity space is semi-private in its intention and proposed for use by specific future residents of a proposed development, thereby allowing for relaxation, socialising and integration. Private open/amenity space is provided on a dwelling-by-dwelling basis, with individual spaces designed solely for private use by the residents of the related unit.

To understand the allocation of public open spaces, communal amenity spaces and hybrid spaces, we recommend that the following Sub-Sections be read alongside DGA's *Open Space Allocation* drawing.

### 7.9.1 Open Space in the Main Residential Site Area

#### 7.9.1.1 Public Open Space

The public open space standard is set by the Development Plan as 15% of the site area<sup>27</sup>. This standard aligns with the range set by Policy and Objective 5.1 of the Compact Growth Guidelines, as discussed in Section 6.4 above.

Within the main residential area, it is proposed in 5 No. parcels (Nos. 1–5 on DGA's *Open Space Allocation* drawing) totalling 7,340 sq m. This is equivalent to 15.2% of its Net Developable Area

<sup>27</sup> We note that the recently published Compact Growth Guidelines stipulate minimum public open space standards as a 'policy and objective' that are effectively within the range of 10–15% of net site area. Therefore, the proposed development also complies with this requirement.



(4.84 Ha), thereby aligning with the Development Plan and Guidelines. During the initial PPC, it was noted by the Planning Authority the public open space was concentrated in certain area of the site, principally the west and centre/north. However, this approach is intentional, as it allows for the retention and demarcation of archaeological features, the appropriate provision of an adequate riparian buffer and the creation of linkages to the forthcoming town park to the north-west.

In terms of the design of the public open space, Ilsa Rutgers Landscape Architecture, in the enclosed *Landscape Design Statement* remarks:

*"The public open space is well distributed across the site and is centrally located to form a series of 'village greens' around which the houses are organised. In all cases, the proposed housing units are orientated to address the public open spaces, to ensure that the proposed parks are well overlooked.*

*Pedestrian and cycle paths are directed through the new public open spaces to create safe and attractive alternatives to short-distance car use and provide opportunities for exercise and social engagement with other residents.*

*The public open space will contribute to the proposed character areas and develop unique qualities that will add variety to the development and provide amenities for all ages."*

The public open space proposal has taken cognisance of the site's archaeological features, most importantly respecting and incorporating the relatively central 'barrow' (discussed further below). Pedestrians and cyclists have been prioritised with the integration of foot and cycle paths; of particular note being the 3 metre wide shared route that traverses from the Blessington Inner Relief Road in the west to beside the existing crèche at the link street in the east.

Meeting/seating areas are included, dispersed across the site to activate and give purpose to the spaces, whilst facilitating socialising and integration.

A play zone features in the heart of the development, placing it as a focal point to the scheme and ensuring it benefits from ample passive surveillance. Its inclusion complies with the Development Plan's requirement for same and will encourage physical activity and social interaction, especially amongst younger residents.

A carefully considered planting regimen is proposed that will incorporate and bolster existing vegetation along the northern boundary, whilst incorporating new tree, shrub and understorey planting. These additions will have aesthetic and biodiversity benefits.

#### **7.9.1.2 Communal Amenity Space**

The communal amenity space quantitative standards for the proposed duplex apartment units are set by the Apartment Design Guidelines. Communal amenity space must be semi-private in nature and can be provided in a variety of different forms, such as courtyards, rear and side gardens, roof tops terraces, etc. and should generally be distinct from private and public open spaces.

As shown in Table 7.20 below, the units in the main residential part of the site generate a requirement for 336 sq m.

| Unit Size | No. Units | CAS Requirement per Unit | CAS Requirement |
|-----------|-----------|--------------------------|-----------------|
| 1-bed     | 24        | 5 sq m                   | 120 sq m        |
| 3-bed     | 24        | 9 sq m                   | 216 sq m        |
| Total     | 48        |                          | 336 sq m        |

**Table 7.20:** Communal amenity space requirements for the proposed 'standard' duplex units in the main residential part of the site

**Source:** *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* (2023) and Thornton O'Connor Town Planning (2024)

As shown in DGA's *Open Space Allocation* drawing, the communal amenity space is proposed in a single large area of 430 sq to the south-west of the site and within easy reach of each of the proposed duplex apartment units (area No. 6). Its provision markedly exceeds the minimum requirement by 94 sq m or 28%.

In terms of qualitative design, it is a combination of hard and surface features, enclosed on multiple sides to create the sense of semi-privacy expected of such a space. It has ample passive surveillance from dwellings to the east and passers-by to the west. Full details are presented in landscape proposals prepared by Ilsa Rutgers Landscape Architecture, which incorporate seating and interaction areas, landscaped spaces and attractive planting.

### 7.9.1.3 Private Open Space

Please refer to Section 7.7.3 for details.

### 7.9.2 Open Space in the Mixed-Use Part of the Site (LLUs)

The various types of open space for the residential LLUs in the mixed-use part of the site are delivered in a hybrid format, which is deemed appropriate due to the distinct residential typology proposed and the flexible provisions of SPPR<sub>1</sub> of the Compact Growth Guidelines. This housing type warrants smaller, more easily managed private open spaces for the houses, but conversely larger, centrally maintained communal amenity and public open spaces.

Private open space for the LLUs is proposed as a series of small and easily managed gardens for the houses and balconies/terraces for the apartments. The size and design of the former have been intentionally reduced so that while they will provide private external space in which to relax and socialise, they will be more easily managed and maintained. Due to the distinct nature of the LLU use, we contend that this is a practical approach to designing and providing these spaces.

For the LLU apartments, the private amenity space requirements of 5 sq m for the 1-bed units and 7 sq m for the 3-bed units have been exceeded, with 8 sq m proposed in all instances. For the 12 No. LLU houses, the 30 sq m requirement set by the Compact Growth Guidelines is exceeded in 7 No. instances, but with 5 No. units provided with 15.4 sq m (greater than 50% of the requirement). The small garden/terrace areas are enclosed, with boundaries established to create a sense of privacy and defensible space.

To account for the smaller private open space areas (i.e. the shortfall of 73 sq m), to provide the communal amenity space required for the apartment LLUs (144 sq m) and to deliver the mixed-use site's public open space (15% of 0.51 Ha, equating to 765 sq m) (totals equating to 909 sq m), a hybrid, shared open space is proposed. This is provided in 2 No. parcels totalling 995 sq m:

- A 745 sq m area laid out in a communal courtyard arrangement, enclosed by LLU houses (area No. 7 on DGA's *Open Space Allocation* drawing).
- A 250 sq m plaza to the south-west of the mixed-used block, with an interface onto the café and pharmacy units (area No. 7 on DGA's *Open Space Allocation* drawing).

This quantitative provision exceeds the combined requirement for the LLUs and this part of the site, delivering it in a practical and pragmatic manner. Given the future occupants of the LLUs, the management of the dwellings by a dedicated entity and the town centre zoning which justifies a progressive approach to open space delivery, we contend that the open space is appropriate and of a high-quality.

Further detail with respect to qualitative design are contained in the materials prepared by Ilsa Rutgers Landscape Architecture.

## 7.10 Flood Risk

The Development Plan's *Strategic Flood Risk Assessment* (SFRA) defers flood risk considerations to the *Flood Risk Assessment* (FRA) prepared as part of the LAP.

The FRA identifies the site within 'Area 2' (see page 9 of the document), approximately between 'Zones' 5 and 6. As the extracted image from the FRA shows (Figure 7.4), the subject site includes a small area at its northern end that is within Flood Zones A and B. The Flood Zone A element is contained within the 'OS – Open Space' zoned part of the site, and the Flood Zone B area partially extends into the residential-zoned part. **Notwithstanding this, it is not proposed to develop residential dwellings within the Flood Zone A and B areas.** Furthermore, we contend that the FRA is dated and lacks site-specific insights.

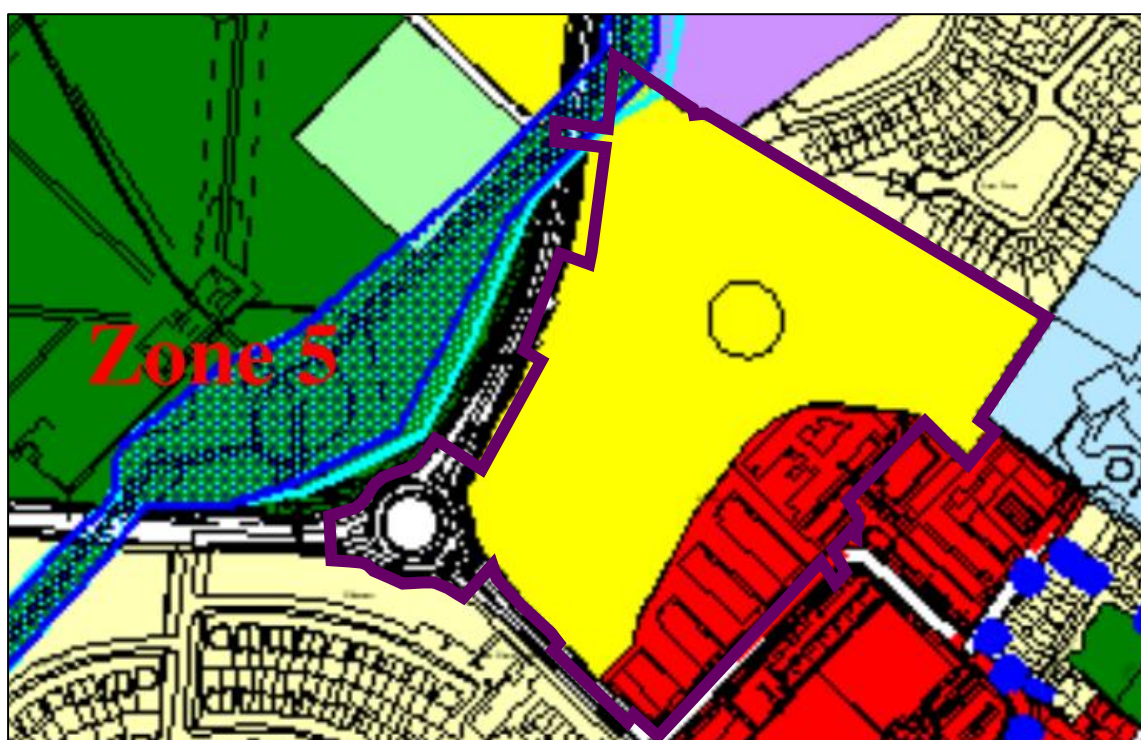


Figure 7.6: Flood risk at the subject site (indicatively outlined in purple)

Source: *Flood Risk Assessment of the Blessington Local Area Plan 2013-2019*

Therefore, as part of this Planning Application, a *Site Specific Flood Risk Assessment* has been prepared by DBFL. The Council is directed to same for a detailed, localised assessment; however, we have extracted the following key conclusions:

*"The Site-Specific Flood Risk Assessment for the proposed development in Blessington was undertaken in accordance with the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and its Technical Appendices.*

*Following the Flood Risk Assessment, it has been determined that all developable land within the site is located in Flood Zone C as defined by the Guidelines.*

*The area where flood Zone A encroachment on the site is not proposed for development and therefore does not affect the classification of the portion of the site which is being developed.*

*It is concluded that the;*

- *Proposed development is appropriate for the site's flood zone category.*
- *The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.*

*In conclusion, the proposed development is considered to have the required level of flood protection."*

#### **7.11 Archaeology**

A review of the National Monuments Services' *Historic Monument Viewer* indicates that 3 No. archaeological features have been noted at the subject site (Figure 7.5):

- A barrow (Wl005-019----);
- A habitation site (Wl005-013----); and
- A designed landscape feature (Wl005-020----).



Figure 7.7: Archaeology understood to be / have been on-site

Source: National Monuments Service's *Historic Environment Viewer*

An *Archaeological Assessment* (May 2024) has been prepared by IAC Archaeology in support of this development and is enclosed under separate cover. It provided the following insights and recommendations:

*"A geophysical survey was carried out within the boundary of the development area and identified instances of ridge and furrow cultivation. Of the recorded archaeological sites; there was no visible evidence of the designed landscape feature (Wl005-020) nor the habitation site (Wl005-013) within the survey data. The barrow (Wl005-019) was visible in the survey data as a circular feature of disturbed ground. No additional sites or features of archaeological potential were identified within the survey area.*

*The geophysical survey was followed by a programme of archaeological test trenching, which was carried out across the site in 2020. Nothing of archaeological significance was identified although the site of the recorded barrow was not tested due to the fact it was proposed to preserve the site in-situ as part of an earlier proposed development.*

*The recorded barrow (Wl005-019) will be preserved in-situ as part of this proposed development. However, it remains possible that the site will be inadvertently impacted upon during construction or during the operation of the residential development.*



*As such, it is recommended that prior to the commencement of construction, a full management plan is developed (in accordance with the detailed design and the construction management plan) in order to ensure the preservation of the recorded barrow site during the construction of the scheme and its operation. This will ensure appropriate measures are put in place to avoid inadvertent impacts and enable the ongoing preservation of the archaeological resource.*

*The recorded designed landscape feature (W1005-020) and habitation site (W1005-013) was subject to archaeological testing in 2020 and no archaeological remains were found to be present at these sites. No other previously unidentified sites of archaeological potential were noted during test trenching within the remainder of the site.*

*Whilst no sites or areas of archaeological potential were noted during the course of the investigations, it remains possible that small or isolated features survive beneath the current ground level and outside of the footprint of the excavated test trenches. Ground disturbances associated with the development have the potential to adversely impact on same.*

*It is recommended that all topsoil stripping associated with the proposed development be monitored by a suitably qualified archaeologist. If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in-situ or by record. Any further mitigation will require approval from the National Monuments Service of the DoHLGH."*

The current proposal for development at the site has evolved taking account of the Assessment's outputs:

- The 'designed landscape feature' was not identified following previous testing and is not deemed to be a constraint to development.
- The 'habitation site' is to be generally respected and no built-development is proposed thereat, with the area incorporated into the landscape proposal.
- The more centrally located 'barrow' feature is to be respected and incorporated into the proposed development and its landscape proposal specifically.

Further guidance will be secured from a qualified Archaeologist prior to and during the construction phase of the development.

## **7.12 Ecology and the Environment**

The increasing importance of ecological and environmental protection has meant that they have been considered throughout the design process. In light of same, Openfield and JBA have undertaken Appropriate Assessment (AA) Screening, Ecological Impact Assessment and Environmental Impact Assessment (EIA) Screening. Whilst the reporting is available for full review under separate covers, their pertinent findings and conclusions are noted below for ease of reference and assessment.

### **7.12.1 Ecological Impact Assessment**

As part of the design and development evolution, Openfield were appointed to undertake an ecological impact assessment and to prepare an *Ecological Impact Statement*. This Report is available for review under separate cover and is intended to assess the potential effects of the



proposed development on habitats and species, most notably those benefitting from national and international protection.

The statement benefits from the undertaking of a series of site and desktop surveys. The former were undertaken on 3<sup>rd</sup> April 2019, 9<sup>th</sup> January 2024 and 24<sup>th</sup> April 2024. A separate bat survey was undertaken on the night/morning of 9<sup>th</sup>/10<sup>th</sup> July 2024 (please refer to Wildlife Surveys Ireland's enclosed report, titled *A Bat Assessment of Blessington, County Wicklow Site Including A visual Assessment, a Bat Activity Survey and Desktop Survey for previous Records*).

Openfield's statement includes a suite of avoidance, remedial and mitigation measures to support the protection of key species and habitats (but not intended to mitigate the possibility of impacts to Natura 2000 sites – which are excluded, as discussed below), resulting in the following conclusion: *"No negative effects to biodiversity are predicted to arise from this development which could be considered greater than minor negative."*

### 7.12.2 Appropriate Assessment

With respect to impact on protected Natura 2000 sites, the enclosed *Screening Report for Appropriate Assessment* prepared by Openfield concluded the following:

*"No significant effects will arise from this project to the Poulaphouca Reservoir SPA or any Natura 2000 site.*

*In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.*

*On the basis of the screening exercise carried out above, it can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded on the basis of the best scientific knowledge available."*

### 7.12.3 Environmental Impact Assessment

JBA's *EIA Screening Report* is provided under separate cover for detailed review. However, in its Section 6, it concluded:

*"The purpose of this report is to identify if there is a need under the Planning and Development Act 2000, as amended, for an EIAR for the proposed LRD at Blessington Demesne, Co. Wicklow.*

*It was determined that the proposed development does not fall under Schedule 5 (Parts 1 and 2) of the Act. As such, an EIAR has not been automatically triggered. To determine whether the development may fall under the category of Sub-threshold development, with the potential to give rise to significant environmental effects, a screening exercise was undertaken.*

*During construction, typical impacts such as noise, traffic disruption, and the generation of small amounts of waste are to be expected. These are typical construction phase impacts and will be mitigated against by environmental operating plans devised by the on-site contractor, following best practice guidance and with reference to other reports prepared for the development, such as the CEMP and RWMP.*

*An AA Screening Report completed by Openfield for the proposed development determined that no likely significant impacts are expected as a result of the proposed development. This is due to the small size of the development and the distance and lack of pathways to Natura 2000 sites.*

*Once operational, the proposed development will be low in environmental impact. The proposed development will, as stated from the Wicklow County Development Plan 2022-2028, improve the area with new housing stock. A long-term positive impact will likely result from the proposed development in terms of population and human health.*

*It has been concluded that the proposed development does not fall under the category of sub-threshold development, and thus an EIAR is not required.*

*The overall conclusion is based on the details of the scheme available at the time of preparation of this report. If the extent of the scheme or the construction methods for the scheme are changed then the EIA Screening assessment should be reviewed."*

### **7.13 Part V**

The Part V proposal is set out on DGA's *Part V Allocation* drawing, included in the submitted pack. A total of 27 No. dwellings (10% of the 269 No. total units) have been proposed, including:

- 17 No. 2-bed E1 townhouses;
- 2 No. 3-bed D1 LLU townhouses;
- 4 No. 3-bed LM2/4/6/8 duplexes; and
- 4 No. 1-bed LM1/3/5/7 duplexes.

Proposed costings, unit details and arrangements are provided in the enclosed documents.

## 8.0 PLANNING ADMINISTRATION

The following plans and particulars are enclosed as part of this application:

### *Planning Fee*

- EFT made payable to *Wicklow County Council* in the sum of **€37,842.80** (representing the planning application fee payable in accordance with Schedule 9 of the *Planning and Development Regulations 2001* (as amended)).

The Planning Fee is calculated as follows:

| Class        | Calculation          | Amount            |
|--------------|----------------------|-------------------|
| Class 14 (b) | €130 x 269 No. Units | €34,970           |
| Class 14 (c) | €7.20 x 399 sq m     | €2,872.80         |
| <b>Total</b> |                      | <b>€37,842.80</b> |

### *Cover Letter and Planning Report*

- This *Planning Report and Statement of Consistency*, prepared by Thornton O'Connor Town Planning, dated 8<sup>th</sup> November 2024.
- Cover Letter* relating to invalidation and the status of the *Draft Blessington Local Area Plan 2025*, prepared by Thornton O'Connor Town Planning, dated 8<sup>th</sup> November 2024.

### *Response to Opinion*

- The *Statement of Response to LRD Opinion*, prepared by Thornton O'Connor Town Planning, dated October 2024.

### *Planning Application Form*

- The Planning Application Form is auto-generated as part of the online planning submission.
- A duly completed current Wicklow County Council LRD Planning Application Form (Form 19), signed and dated 8<sup>th</sup> November 2024.

### *Notices*

- A copy of a scanned page of the *Irish Daily Star* dated 8<sup>th</sup> November 2024 in which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, 2001* (as amended).

- A copy of the Site Notice dated 8<sup>th</sup> November 2024 and erected or fixed on the land or structure pursuant to article 17(1)(b) of the *Planning and Development Regulations, 2001* (as amended).

### Consents

- *Letter of Consent to Lodge*, from Marshall Yards Development Company Limited, dated October 2024;
- *Letter of Consent*, from Glenveagh Homes Limited, dated 3<sup>rd</sup> October 2024.

### Architecture

The following documents and drawings prepared by Deady Gahan Architects:

- *Architectural Design Statement* (Part 1 of 4), dated October 2024;
- *Architectural Design Statement* (Part 2 of 4), dated October 2024;
- *Architectural Design Statement* (Part 3 of 4), dated October 2024;
- *Architectural Design Statement* (Part 4 of 4), dated October 2024;
- *Housing Quality Assessment*, dated October 2024; and
- *Universal Design Statement*, dated October 2024.

| Drawing No.  | Drawing Title   | Scale       | Size |
|--------------|---|-------------|------|
| 23072/P/001  | Site Location Map   | 1:10,560    | A3   |
| 23072/P/002  | Site Location Map   | 1:1000      | A1   |
| 23072/P/003  | Proposed Site Plan  | 1:500       | A0   |
| 23072/P/003B | Existing Site Plan  | 1:500       | A0   |
| 23072/P/004A | Site Section A-A  | 1:200/1:500 | A1   |
| 23072/P/004B | Site Section B-B  | 1:200/1:500 | A1   |
| 23072/P/004C | Site Section C-C  | 1:200/1:500 | A1   |
| 23072/P/004D | Site Section D-D  | 1:200/1:500 | A1   |
| 23072/P/004E | Site Section E-E  | 1:200/1:500 | A1   |
| 23072/P/004F | Site Section F-F  | 1:200/1:500 | A1   |
| 23072/P/004G | Site Section G-G  | 1:200/1:500 | A1   |
| 23072/P/005  | Taking in Charge  | 1:500       | A0   |
| 23072/P/006  | Part V Allocation   | 1:500       | A0   |
| 23072/P/008  | Parking, Bins and Bikes Scheme  | 1:500       | A0   |
| 23072/P/011A | Proposed Secure Bike Store T <sub>3</sub>                                   | 1:50        | A3   |
| 23072/P/011B | Proposed Secure Bike Store T <sub>5</sub>                                   | 1:50        | A3   |
| 23072-P-012  | Bike Stores and Bin Stores T <sub>1</sub> , T <sub>2</sub> & T <sub>4</sub> | 1:25        | A3   |
| 23072/P/013  | Proposed Secure Bin Store   | 1:50        | A3   |
| 23072/P/014  | Phasing Strategy  | 1:500       | A0   |
| 23072/P/010  | ESB Substation Plan, Elevations and Section A-A                             | 1:50        | A3   |
| 23072/P/015  | Proposed Site Plan (Zoning Overlay)   | 1:500       | A0   |

| Drawing No. | Drawing Title   | Scale        | Size |
|-------------|---|--------------|------|
| 23072-P-301 | House Type D1_CA1 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-302 | House Type D1_CA1 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-401 | House Type E1_CA1 – Floor Plans, Elevations, Section A-A        | As Indicated | A3   |
| 23072-P-501 | House Type F1_CA1 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-502 | House Type F1_CA1 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-511 | House Type F2_CA1 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-512 | House Type F2_CA1 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072_P_521 | House Type F3_CA1 – Floor Plans                                 | As Indicated | A3   |
| 23072_P_522 | House Type F3_CA1 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072_P_531 | House Type F5_CA1 – Floor Plans                                 | As Indicated | A3   |
| 23072_P_531 | House Type F5_CA1 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-551 | House Type F7_CA1 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-552 | House Type F7_CA1 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-305 | House Type D1_CA2 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-305 | House Type D1_CA2 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-305 | House Type E1_CA2 – Floor Plans, Elevations, Section A-A        | As Indicated | A3   |
| 23072-P-505 | House Type F1_CA2 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-506 | House Type F1_CA2 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-515 | House Type F2_CA2 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-516 | House Type F2_CA2 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072_P_525 | House Type F3_CA2 – Floor Plans                                 | As Indicated | A3   |
| 23072_P_526 | House Type F3_CA2 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-535 | House Type F4_CA2 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-536 | House Type F4_CA2 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072_P_545 | House Type F5_CA2 – Floor Plans                                 | As Indicated | A3   |
| 23072_P_546 | House Type F5_CA2 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-555 | House Type F7_CA2 – Floor Plans                                 | As Indicated | A3   |
| 23072-P-556 | House Type F7_CA2 – Elevations and Section A-A                  | 1:100        | A3   |
| 23072-P-700 | Apt/Duplex Type LM – Ground Floor Plan                          | As Indicated | A3   |
| 23072-P-701 | Apt/Duplex Type LM – First Floor Plan                           | 1:100        | A3   |
| 23072-P-702 | Apt/Duplex Type LM – Second Floor Plan                          | 1:100        | A3   |
| 23072-P-703 | Apt/Duplex Type LM – Front and Side Elevations, Roof Level Plan | As Indicated | A3   |
| 23072-P-704 | Apt/Duplex Type LM – Rear and Side Elevations and Section A-A   | As Indicated | A3   |

| Drawing No.  | Drawing Title   | Scale        | Size |
|--------------|---|--------------|------|
| 23072-P-800  | Apt/Duplex Type LM Corner – Ground Floor Plan                                 | As Indicated | A3   |
| 23072-P-801  | Apt/Duplex Type LM Corner – First Floor Plan                                  | 1:100        | A3   |
| 23072-P-802  | Apt/Duplex Type LM Corner – Second Floor Plan                                 | 1:100        | A3   |
| 23072-P-803  | Apt/Duplex Type LM Corner – Front and Side Elevations, Roof Level Plan        | As Indicated | A3   |
| 23072-P-804  | Apt/Duplex Type LM Corner – Rear and Side Elevations and Section A-A          | As Indicated | A3   |
| 23072-P-805  | Apt/Duplex Type LM Corner 2 – Ground Floor Plan                               | As Indicated | A3   |
| 23072-P-806  | Apt/Duplex Type LM Corner 2 – First Floor Plan                                | 1:100        | A3   |
| 23072-P-807  | Apt/Duplex Type LM Corner 2 – Second Floor Plan                               | 1:100        | A3   |
| 23072-P-808  | Apt/Duplex Type LM Corner 2 – Front and Side Elevations, Roof Level Plan      | As Indicated | A3   |
| 23072-P-809  | Apt/Duplex Type LM Corner 2 – Rear and Side Elevations and Section A-A        | As Indicated | A3   |
| 23072-P-900  | Mixed-Use Building – Ground, First and Second Floor Plans and Side Elevations | As Indicated | A1   |
| 23072-P-901  | Mixed-Use Building – Third & Fourth Floor Plans & Roof Plan                   | As Indicated | A1   |
| 23072-P-902  | Mixed-Use Building – Elevations & Section A-A & Signage                       | As Indicated | A1   |
| 23072-P-1001 | House Type A1_CA2 – Floor Plans   | As Indicated | A3   |
| 23072-P-1002 | House Type A1_CA2 – Elevations and Section A-A                                | 1:100        | A3   |
| 23072-P-1005 | House Type A2_CA2 – Floor Plans   | As Indicated | A3   |
| 23072-P-1006 | House Type A2_CA2 – Elevations and Section A-A                                | 1:100        | A3   |
| 23072-P-1101 | Type J1-CA2 – Floor Plans   | As Indicated | A3   |
| 23072-P-1102 | Type J1-CA2 – Elevations and Section A-A                                      | As Indicated | A3   |
| 23072-P-1105 | Type J2-CA2 – Floor Plans   | As Indicated | A3   |
| 23072-P-1106 | Type J2-CA2 – Elevations and Section A-A                                      | As Indicated | A3   |
| 23072-P-1201 | Type K1-CA2 – Floor Plans   | As Indicated | A3   |
| 23072-P-1202 | Type K1-CA2 – Elevations and Section A-A                                      | 1:100        | A3   |
| 23072-P-1205 | Type K2-CA2 – Floor Plans   | As Indicated | A3   |
| 23072-P-1206 | Type K2-CA2 – Elevations and Section A-A                                      | 1:100        | A3   |

## Engineering

- The *Stage 1&2 Road Safety Audit* prepared by Bruton Consulting Engineers, dated August 2024.

The following documents and drawings prepared by DBFL Consulting Engineers:

- *Infrastructure Design Report* (Part 1 of 3), dated October 2024;
- *Infrastructure Design Report* (Part 2 of 3), dated October 2024;
- *Infrastructure Design Report* (Part 3 of 3), dated October 2024;



- *DMURS Design Statement*, dated October 2024;
- *Construction & Environmental Management Plan*, dated October 2024;
- *Accessibility Report*, dated October 2024;
- *Mobility Management Plan*, dated October 2024;
- *Site Specific Flood Risk Assessment (Part 1 of 3)*, dated October 2024;
- *Site Specific Flood Risk Assessment (Part 2 of 3)*, dated October 2024;
- *Site Specific Flood Risk Assessment (Part 3 of 3)*, dated October 2024;
- *Traffic and Transport Assessment (Part 1 of 2)*, dated October 2024; and
- *Traffic and Transport Assessment (Part 2 of 2)*, dated October 2024.

| Drawing No.                         | Drawing Title                                  | Scale    | Size |
|-------------------------------------|--|----------|------|
| 230199-X-92-Zoo-DTM-DR-DBFL-CE-3321 | Foul Longitudinal Sections Sheet 1             | As Noted | A1   |
| 230199-X-92-Zoo-DTM-DR-DBFL-CE-3322 | Foul Longitudinal Sections Sheet 2             | As Noted | A1   |
| 230199-X-04-Zoo-DTM-DR-DBFL-CE-1210 | Road Hierarchy Layout                          | 1:500    | A1   |
| 230199-X-04-Zoo-DTM-DR-DBFL-CE-1201 | Proposed Road Layout                           | 1:500    | A1   |
| 230199-X-90-Zoo-DTM-DR-DBFL-CE-1203 | Signage and Line Marking                       | 1:500    | A1   |
| 230199-X-05-Zoo-DTM-DR-DBFL-CE-1301 | Site Services Layout                           | 1:500    | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-3311 | SW Longitudinal Sections Sheet 1               | As Noted | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-3312 | SW Longitudinal Sections Sheet 2               | As Noted | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-3313 | SW Longitudinal Sections Sheet 3               | As Noted | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-5305 | Typical Attenuation Details Sheet 1            | As Noted | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-5306 | Typical Attenuation Details Sheet 2            | As Noted | A1   |
| 230199-X-04-Zoo-DTM-DR-DBFL-CE-5201 | Typical Roads Construction Details Sheet 1     | As Noted | A1   |
| 230199-X-04-Zoo-DTM-DR-DBFL-CE-5202 | Typical Roads Construction Details Sheet 2     | As Noted | A1   |
| 230199-X-04-Zoo-DTM-DR-DBFL-CE-5203 | Typical Roads Construction Details Sheet 3     | As Noted | A1   |
| 230199-X-04-Zoo-DTM-DR-DBFL-CE-5204 | Typical Roads Construction Details Sheet 4     | As Noted | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-5301 | Typical Surface Water Drainage Details Sheet 1 | As Noted | A1   |

| Drawing No.                         | Drawing Title                                  | Scale    | Size |
|-------------------------------------|--|----------|------|
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-5302 | Typical Surface Water Drainage Details Sheet 2 | As Noted | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-5303 | Typical Surface Water Drainage Details Sheet 3 | As Noted | A1   |
| 230199-X-91-Zoo-DTM-DR-DBFL-CE-5304 | Typical Surface Water Drainage Details Sheet 4 | As Noted | A1   |
| 230199-X-05-Zoo-DTM-DR-DBFL-CE-1331 | Watermain Layout                               | 1:500    | A1   |

### Landscape

- The *Landscape Design Statement* prepared by Ilsa Rutgers Landscape Architects, dated October 2024.
- The following Drawings prepared by Ilsa Rutgers Landscape Architects:

| Drawing No. | Drawing Title                              | Scale          | Size   |
|-------------|--|----------------|--------|
| 1000        | Landscape Context Plan                     | 1:2000/ 1:1000 | A3/ A1 |
| 2000        | Landscape Masterplan – Northern Precinct   | 1:1000/ 1:500  | A3/ A1 |
| 2005        | Landscape Masterplan – Southern Precinct   | 1:1000/ 1:500  | A3/ A1 |
| 2500        | Hard Landscaping and Street Furniture Plan | 1:1500/ 1:750  | A3/ A1 |
| 3000        | Boundary Treatment Plan                    | 1:1500/ 1:750  | A3/A1  |
| 4000        | Primary Planting Plan                      | 1:1500/ 1:750  | A3/A1  |
| 4500        | Secondary Planting Plan                    | 1:1500/ 1:750  | A3/A1  |
| 6000        | Site Sections                              | 1:400/ 1:200   | A3/A1  |

### Mechanical & Electrical

- The *Energy Efficiency and Climate Change Adaption Design Statement* prepared by Waterman Moylan Consulting Engineers Limited, dated October 2024.
- The *Electric Vehicle Charging Strategy* prepared by Kerrigan Consulting.
- The *Outdoor Lighting Report* prepared by Sabre Electrical Services Ltd., dated 13<sup>th</sup> August 2024.
- The *Lighting Design Letter* prepared by Waterman Moylan Consulting Engineers Limited, dated 8<sup>th</sup> October 2024.
- The following Drawing prepared by Sabre Electrical Services Ltd.:

| Drawing No. | Drawing Title          | Scale  | Size |
|-------------|------------------------|--------|------|
| SES 08824   | Public Lighting Layout | 1:1000 | A1   |

### Arboriculture

- The *Arboricultural Assessment & Impact Report* prepared by CMK Hort + Arb Ltd.
- The following Drawings prepared by CMK Hort + Arb Ltd.:

| Drawing No. | Drawing Title                           | Scale | Size |
|-------------|---|-------|------|
| 101         | Tree Survey and Constraints             | 1:750 | A1   |
| 102         | Arboricultural Impact & Tree Protection | 1:750 | A1   |

### Archaeology

- The *Archaeological Assessment* prepared by IAC Archaeology, dated August 2024.

### Environmental & Ecology

- The *Screening Report for Appropriate Assessment* prepared by OpenField Ecological Services, dated August 2024.
- The *Ecological Impact Statement* prepared by OpenField Ecological Services, dated October 2024.
- The *Bat Assessment* prepared by Wildlife Surveys Ireland, dated October 2024.
- The *EIA Screening Report* prepared by JBA Consulting, dated October 2024.
- The *103(1A)(a) Statement* prepared by JBA Consulting, dated October 2024.

### Waste Management

- The *Operational Waste Management Plan* prepared by Byrne Environmental Consulting, dated 3<sup>rd</sup> October 2024.
- The *Resource and Construction Waste Management Plan* prepared by Byrne Environmental Consulting, dated 3<sup>rd</sup> October 2024.

### Daylight & Sunlight

- The *Daylight & Sunlight Assessment Report* prepared by 3D Design Bureau, dated August 2024.

### Photomontages

- The *Verified Views, Presentation and CGI* prepared by 3D Design Bureau, dated August 2024.

### ***Social Infrastructure***

- The *Social Infrastructure Audit (Incl. Childcare and Schools)* prepared by Thornton O'Connor Town Planning, dated September 2024.

### ***Part V***

- The *Part V Confirmation Letter* prepared by Marshall Yards Development Company Limited, dated 12<sup>th</sup> September 2024. (Costings are in a separate confidential enclosure.)
- The *Part V Validation Letter* issue by Wicklow County Council, dated 30<sup>th</sup> October 2024.

### ***Building Lifecycle***

- The *Building Life-Cycle Report* prepared by Deady Gahan Architects, dated October 2024.

### ***Property Management***

- The *Property Management Strategy Report* prepared by Deady Gahan Architects, dated October 2024.

## 9.0 CONCLUSION

We submit that the proposed development comprising 233 No. residential units, 36 No. LLUs, medical centre, café and pharmacy represents an appropriate and attractive design solution at the subject site. It is further considered that the proposed development is an appropriately scaled scheme that can be easily assimilated into its receiving environment, tying-in with existing town centre development to the south-east.

It fully accords with the key principles of proper planning and sustainable development, with respectful increases in height, scale and density since the initial PPC, as requested by the Council.

Furthermore, the proposal will make positive contributions to the local community and town of Blessington by way of the additional public open space and improvements to the BIRR with the delivery of cycle and pedestrian crossings.

We trust that the detail provided in this Report and the supporting, enclosed materials provide the Council with sufficient information to Grant Planning Permission for the development. Should you require any additional insights, please do not hesitate to contact the undersigned.

Yours faithfully,



**Daniel Moody**  
**Associate**  
**Thornton O'Connor Town Planning**