



An  
Bord  
Pleanála

## Inspector's Report

### ABP-312479-22

Development	Blessington Greenway consisting of approximately 33km of walking and cycling paths that travel around Poulaphouca Reservoir/ Blessington Lakes
Location	Various townlands in north-western Co. Wicklow & the townland of Glebe East, Co. Kildare.
Local Authority	Wicklow County Council
Type of Application	Application for approval made under Section 177(AE) of the Planning and Development Act, 2000 (local authority development requiring appropriate assessment)
Prescribed Bodies	<ol style="list-style-type: none"><li>1. Department of Housing, Local Government and Heritage</li><li>2. Dublin City Council Water Services</li><li>3. Fáilte Ireland</li><li>4. Uisce Éireann</li></ol>

5. Kildare National Roads Office

Observer(s)

See Appendices 1 & 5

Date of Site Inspection

18<sup>th</sup> November 2022

Inspector

Donal Donnelly

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## **1.0 Introduction**

- 1.1. Wicklow County Council is seeking approval from An Bord Pleanála for a greenway consisting of 33km of walking and cycling paths around Blessington Lakes/ Poulaphouca Reservoir, Co. Wicklow. The proposed development site is located adjoining/ within the Poulaphouca Reservoir SPA and in proximity to the Wicklow Mountains SPA and the Wicklow Mountains SAC, which are designated European sites. There are several other designated European sites (SACs) in proximity to the proposed works (see further analysis below). A Natura Impact Statement (NIS) and application under Section 177AE was lodged by the Local Authority on the basis of the proposed development's likely significant effect on a European site.
- 1.2. Section 177AE of the Planning and Development Act, 2000 (as amended) requires that where an appropriate assessment is required in respect of development by a local authority, the authority shall prepare a NIS and the development shall not be carried out unless the Board has approved the development with or without modifications. Furthermore, Section 177V of the Planning and Development Act, 2000 (as amended) requires that the appropriate assessment shall include a determination by the Board as to whether or not the proposed development would adversely affect the integrity of a European site. The appropriate assessment shall be carried out by the Board before consent is given for the proposed development.

## **2.0 Proposed Development**

- 2.1. An application for approval under Section 177(AE) of the Planning and Development Act, 2000 (local authority development requiring appropriate assessment) was received by the Board from Wicklow County Council. The proposed development follows an earlier Part VIII planning approval for a greenway which was passed unanimously by County Councillors in 2017.
- 2.2. The proposed development in north-western Co. Wicklow consists of the development of a 33km greenway around Blessington Lakes/ Poulaphouca Reservoir. The proposal will involve the upgrade of an existing 5km length of greenway between Blessington and Russborough House, together with the construction of a new 25km length of greenway around the lakeshore mostly on ESB

lands. The remainder of the route will consist of an urban cycling scheme/ traffic calming.

- 2.3. The lakeshore edge is predominantly commercial conifer plantation and there is an existing trail where walkers have worn a path through these lands. This will be resurfaced and widened as part of the proposed development. Approximately 7,265 trees will be removed to facilitate the greenway. There are relatively high densities and long stretches of conifer plantation along the proposed route and tree management activities typically involve the clear felling of between 1,750 and 2,500 trees every 2/3 years. Replacement tree planting with new native species will take place along the route and on lands owned by Wicklow County Council.
- 2.4. There are eight proposed road crossings along the route at Blessington (3 no.), Baltyboys (4 no.) and Valleymount (1 no.). Traffic lights are proposed at Knockieran Bridge, Baltyboys Bridge and Valleymount Bridge to facilitate a new one-way system for motorised traffic in place of the existing 2-way system and to provide for a shared use path for greenway users. A number of access slips to the lake will be provided with gated crossings of the greenway and priority afforded to greenway users.
- 2.5. Culverts/ bridges will be constructed at river crossings. A new greenway bridge is proposed at Annacarney at the toe of an existing bridge embankment. Other structural elements will include rock armour at Blessington (367m), Baltyboys (1,614m), Valleymount (310m), Ballyknockan (278m) and Lacken (942m). Rock armour is already in place at various locations to manage erosion. A retaining structure is also proposed at Blessington and an underpass will be developed to connect to Knockieran car park. Car parking facilities will be upgraded at Knockieran, Lacken, Valleymount (East & West), Baltyboys and Russellstown to include drinking water stations, electric vehicle and bike charging points, bicycle parking, bins, seating, information signage and CCTV. Car park extensions are also proposed at Knockieran and Russellstown.
- 2.6. The greenway surface will be a bound pavement consisting of a 20mm surface course, 40-55mm base course, 150 clause 804 sub-base and a geotextile layer and capping where necessary. An elevated boardwalk may be required over short sections depending on ground conditions. The greenway will have a 3m minimum width, widening to 4m near trailhead car parks. The overall development will have

an area of 16.64 hectares with an additional area of 3.34 hectares for earthworks during construction.

2.7. Accompanying documents:

- Public notices
- Planning Application Report
- NIS
- Environmental Report
- Letters to Prescribed Bodies
- Flood Risk Assessment
- Outline Construction Environmental Management Plan
- Traffic and Transport Assessment
- Road Safety Audit
- Infrastructure Design Report
- Arborist's Report
- Landscape drawings
- Planning drawings
- Non-Statutory Public Consultation Report

### 3.0 **Site and Location**

- 3.1. The subject site is located within a total of 23 no. townlands around Blessington Lakes in western Co. Wicklow. The route of the proposed greenway passes through the town of Blessington, and the villages of Valleymount, Ballyknockan and Lacken. A c. 300m section of the greenway route enters Co. Kildare along the N81 at Kilmalum.
- 3.2. The site continues over a distance of approximately 33km predominately along existing walking and cycling routes through forestry and woodland adjacent to the

shoreline of Blessington Lakes. The site is divided into six sections within planning application documentation, which are summarised as follows:

- 3.3. **Blessington (9.2km)** – This section extends along the north-western side of the lake from Knockieran Bridge and along the lakeshore to the south of Kilbride Road on the north-eastern approach to Blessington town. The route joins Kilbride Road before its junction with Main Street and continue through the town centre and in front of dwellings on Rockypool Villas and onto Troopersfield, which provides access to Blessington Retail Park to the south of the town. The route then turns in towards The Avon lakes pursuits centre where it joins with the existing Blessington Greenway to Russelstown car park. This section of existing greenway travels for a distance of approximately 5km through wooded areas adjacent to the shoreline. The pathway consists mainly of packed gravel with some sections of boardwalk. The greenway continues alongside the N81 for a distance of approximately 300m and across a bridge over a reservoir inlet. The proposed greenway goes past Russelstown car park a short distance to the south of Russborough House.
- 3.4. **Baltyboys (5.3km)** – This section of the proposed greenway extends from Baltyboys Bridge to Valleymount Bridge. The route continues along the eastern side Baltyboys peninsula on the lake side of the R758. There is an existing car park beside the Baltyboys Bridge, which will serve the greenway. A sandy shoreline occurs along this section and much of the shoreline is also planted with trees. It is stated in planning application documentation that the proposed greenway crosses approximately 5 no. small watercourses/ ditches along this section. Blessington Lakes Sailing Club is located along this section and there is a proposed greenway link to Tulfarris Hotel Golf Resort.
- 3.5. **Tulfarris (3.7km)** – This section extends along a local road off the R758. The local road continues up-gradient to a “T” junction and a new cycle/ pedestrian way is proposed through the hotel grounds. The local road is narrow in places and there are a number of sharp corners. This road also serves adjoining agricultural lands. Planning application documentation states that there are approximately 2 no. new small watercourse/ ditch crossings along this length.
- 3.6. **Valleymount (5.2km)** – This sections continues between Valleymount Bridge and around the southern section of the lake and as far as Ballyknockan. Valleymount car



park and Valkeymount GAA club are situated at the northern end of this section and the route continue along the eastern side of the peninsula to the east of Valkeymount village. The route crosses the Annacarney Stream then continues east through woodland strips along the shoreline, which is sandy along all of this section. Planning application documentation states that there are 3 no. crossings of small watercourses/ ditches, including Ballyknockan Brook.

- 3.7. **Ballyknockan (4.3km)** – This section extends between the villages of Ballyknockan and Lacken along the south-eastern shoreline. Topography rises steeply to the east up to the parallel local road and Moanbane Mountain and Black Hill. There are approximately 13 no. small watercourses/ ditches along this section including Oghill Brook, Fraughan Brook and Ballynastockan Brook.
- 3.8. **Lacken (5.6km)** – The final section from Lacken to Knockieran Bridge includes the crossing of approximately 7 no. small watercourses/ ditches. The local road also continues parallel to the proposed greenway on higher ground along this section. There is an existing car park at Knockieran on the southern side of the bridge and at the northern end of this section.

## 4.0 Planning History

Wicklow County Council Reg. Ref: 17/307

- 4.1. Part VIII permission granted for a greenway development comprising a new crushed stone track in order to create a walking & cycling greenway which will follow the edge of the Blessington Lakes, together with the upgrading of the existing tracks commencing in the town of Blessington and following a route close to the shoreline.
- 4.2. Upgrading works will include widening of existing track and laying of geotextile with a surface layer of crushed stone surface. Construction works would involve shallow excavation, laying of geotextile with a surface layer of crushed stone surface, placement of approximately 100 culverts, 18 light bridges over larger streams, fencing and minor landscaping.

Wicklow County Council Reg Ref: 22/212 (ABP-314622-22)

- 4.3. Permission granted by the Board in January 2024 for development described as a greenway tourism glamping centre incorporating 5 no. detached accommodation

Pods, management centre incorporating a shared kitchen, guest bathroom facilities, publicly accessible WC along with 3 no. camper van serviced bays, new entrance, access road, car parking and on-site treatment system with percolation area along with all associated site development and facilitating works.

Wicklow County Council Reg Ref: 22/792 (ABP-314730-22)

- 4.4. Permission refused by the Board in November 2023 for change of use from tennis court and car parking to an area for the parking of vehicles where food is served from mobile vehicles. Retention permission was also sought for an outdoor wooden bar area and all landscaping, boundary treatment and all ancillary works at Blessington lake shore, Burgage, Blessington.
- 4.5. The reason for refusal referred to the excessive scale and distance from Blessington town centre, together with the removal of existing tourist facilities on site and the non-ancillary nature of the proposed development relative to the established tourist-related facility at this site.

Wicklow County Council Reg Ref: 17/1215 (ABP-302615-18)

- 4.6. Decision quashed for a high performance training centre at Burgage Moyle, off R758, Blessington including the following:- (i) single storey boathouse (1,598 sq.m.) with eleven bays for rowing boats (ii) two storey attached ancillary building (729 sq.m.), housing launch boat area, with 8 bays for safety boats, equipment store, boiler room and water storage on ground floor, with changing areas, gym, meeting rooms, and balcony / terrace at first floor level (iii) new vehicular access from R758 with vehicular and pedestrian access points, gates and pillars (iv) footpaths to boathouses, club house and lake edge (v) 78 car parking spaces and (vi) drainage including sealed steel effluent holding tank, oil and petrol interceptor holding tank, surface water attenuation, all site development works including fencing, hard and soft landscaping. A Natura Impact Statement was submitted as part of this application.

- 4.7. The reactivated case number is ABP-314020-22.

Wicklow County Council Reg Ref: 20914 (ABP-310167-21)

- 4.8. Permission refused for the sub-division and conversion of an existing single and two storey agricultural outbuilding to provide 5 no. holiday cottages (3 no. one

bedroomed and 2 no. two bedroomed) to include modifications to existing elevations and provision of roof lights, relocate the existing entrance, replace the wastewater treatment system with an integrated constructed wetland system to treat wastewater generated from the existing dwelling and the holiday cottages and all associated site works and landscaping.

- 4.9. Reasons for refusal related to the separation distance from the reservoir for wastewater treatment systems, and the potential for significant effects on the SPA in the absence of a NIS.

## 5.0 Legislative and Policy Context

- 5.1. **The EU Habitats Directive (92/43/EEC):** This Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) and 6(4) requires an appropriate assessment of the likely significant effects of a proposed development on its own and in combination with other plans and projects which may have an effect on a European Site (SAC or SPA).

- 5.2. **Planning and Development Acts 2000 (as amended):** Part XAB of the Planning and Development Acts 2000-2017 sets out the requirements for the appropriate assessment of developments which could have an effect on a European site or its conservation objectives.

- 177(AE) sets out the requirements for the appropriate assessment of developments carried out by or on behalf of local authorities.
- Section 177(AE) (1) requires a local authority to prepare, or cause to be prepared, a Natura Impact Statement in respect of the proposed development.
- Section 177(AE) (2) states that a proposed development in respect of which an appropriate assessment is required shall not be carried out unless the Board has approved it with or without modifications.
- Section 177(AE) (3) states that where a Natura impact assessment has been prepared pursuant to subsection (1), the local authority shall apply to the Board for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.

- Section 177(V) (3) states that a competent authority shall give consent for a proposed development only after having determined that the proposed development shall not adversely affect the integrity of a European site.
- Section 177AE (6) (a) states that before making a decision in respect of a proposed development, the Board shall consider the NIS, any submissions or observations received and any other information relating to:
  - The likely effects on the environment.
  - The likely consequences for the proper planning and sustainable development of the area.
  - The likely significant effects on a European site.

5.3. **National nature conservation designations:** The Department of Housing, Local Government and Heritage and the National Parks and Wildlife Service are responsible for the designation of conservation sites throughout the country. The three main types of designation are Natural Heritage Areas (NHA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and the latter two form part of the European Natura 2000 Network.

5.4. European sites located within/ in proximity to the subject site include:

- Poulaphouca Reservoir SPA (Site code: 004063)
- Wicklow Mountains SPA (Site code: 004040)
- Wicklow Mountains SAC (Site code: 002122)

5.5. Poulaphouca Reservoir is also designated as a proposed Natural Heritage Area.

#### 5.6. **Climate Action Plan, 2024**

5.6.1. The Climate Action Plan (CAP24) sets out a roadmap to halve emissions by 2030 and reach net zero by no later than 2050. CAP24 builds upon CAP23 by refining and updating the measures and actions required to deliver carbon budgets and sectoral emissions ceilings that were introduced under the Climate Action and Low Carbon Development (Amendment) Act, 2021. Sector emission ceilings were approved by Government in July 2022 for the electricity, transport, built environment – residential, built environment – commercial, industry, agricultural and other (F-

gases, waste & petroleum refining) sectors. Reflecting the continuing volatility for Land Use, Land Use Change and Forestry (LULUCF) baseline emissions to 2030 and beyond, CAP24 puts in place ambitious activity targets for the sector reflecting an EU-type approach. With respect to forestry, it is stated that the mitigation potential of afforestation and reforestation is limited in the first 10 years and the sequestration rate of trees is low at first and increases after 10 years as they mature. Thus, plantings now at any scale will not contribute much in the way of sequestration out to 2030, yet they will be critical post 2030.

- 5.6.2. Citizen engagement and a strengthened social contract between the Government and the Irish people will be required around climate action. It is also recognised that policies on spatial planning, taxation, sustainable finance, and non-financial reporting have a key role to play in supporting and enabling the delivery of emissions reductions across multiple sectors and in mobilising climate finance, and facilitating a just transition to a carbon neutral society. A just transition framework structures how we will integrate just transition considerations into our climate action policies, as highlighted by sectoral examples provided throughout this Plan.
- 5.6.3. The electricity sector will help to decarbonise the transport, heating and industry sectors and will face a huge challenge to meet requirements under its own sectoral emissions ceiling. For transport, CAP23 reframed the previous pathway outlined in CAP21 under the Avoid-Shift-Improve Framework to achieve a net zero decarbonisation pathway. This hierarchical framework has been applied again in CAP24 to prioritises actions to reduce or **avoid** the need to travel; **shift** to more environmentally friendly modes; and **improve** the energy efficiency of vehicle technology.
- 5.6.4. Road space reallocation is a measure outlined under both 'avoid' and 'shift' to promote active travel and modal shift to public transport. Road space reallocation and a sustainable approach to parking policy form key measures in reducing unsustainable private car demand, enhancing placemaking, and supporting improvements in the accessibility and air quality of our urban spaces. The Design Manual for Urban Roads and Streets is the principal design standard for all urban roads and further work is underway in relation to guidance and advice notices for local authorities with regard to the reallocation of street-space and landscaping. The

provision of safe and accessible walking and cycling infrastructure is also recognised in CAP24 as being key to encouraging modal 'shift' away from the private car.

- 5.6.5. It is noted that the National Cycle Network (NCN) will set out the inter-urban cycling network (approximately 3,500km) around the country linking urban centres, and this network will include many existing and planned greenway routes. The roll out of cycle infrastructure will see the prioritisation of Safe Routes to School, CycleConnects routes, the National Cycle Network and scenic greenways. The Department of Transport recognises and supports the wide range of benefits arising from greenways including their positive economic impact on local businesses, enabling increased physical activity that will benefit the health and wellbeing of users and supporting safe journeys to and from home, work, education and shops.

## **5.7. National Planning Framework, 2018**

- 5.7.1. The National Planning Framework provides policies, actions and investment to deliver 10 National Strategic Outcomes and priorities of the National Development Plan. These include strengthened rural economies and communities; sustainable mobility; enhanced amenities and heritage; sustainable management of water, waste and other environmental resources; and transition to a low carbon and climate resilient society.
- 5.7.2. Enhanced amenities and heritage will require investment in well-designed public realm, which includes public spaces, parks and streets, and recreational infrastructure, as well as amenities in rural areas, such as activity-based tourism and trails, e.g. greenways, blueways and peatways.
- 5.7.3. The following national policy objectives are also of relevance to the proposed Blessington eGreenway:

*National Policy Objective 22:*

*Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.*

*National Policy Objective 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.*

*National Planning Objective 54:*

*Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.*

## **5.8. Eastern & Midlands Regional Spatial & Economic Strategy, 2019-2031**

- 5.8.1. The RSES provides a spatial strategy, economic strategy, metropolitan plan, investment framework and climate action strategy to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.
- 5.8.2. It is recognised in the RSES that there are significant opportunities to develop a number of flagship greenways in the Region, including the Blessington Greenway, which offers the potential to attract people to work and visit the area and surrounding villages.
- 5.8.3. This strategy sets out 16 Regional Strategic Outcomes aligned to the three key principles of healthy placemaking, economic opportunity and climate action. The following Regional Policy Objectives are relevant to the proposal:
- *RPO 6.17: Support the maintenance of, and enhanced access to state and semi-state lands such as National Parks, Forest Parks, Waterways, etc., together with Monuments and Historic Properties, for recreation and tourism purposes. Access should be planned and managed in a sustainable manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.*
  - *RPO 7.24: Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and /or linked with local greenways and*

*other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable.*

- *RPO 7.25: Support local authorities and state agencies in the delivery of sustainable strategic greenways, blueways, and peatways projects in the Region under the Strategy for the Future Development of National and Regional Greenways.*
- *RPO 7.26: Support the development of guidance for assessment of proposed land zonings in order to achieve appropriate riparian setback distances that support the attainment of high ecological status for waterbodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains.*
- *RPO 7.22: Local authority development plan and local area plans, shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.*
- *RPO 7.23: Support the further development of Green Infrastructure policies and coordinate the mapping of strategic Green Infrastructure in the Region.*

## **5.9. Transport Strategy for the Greater Dublin Area 2022-2042**

- 5.9.1. The 2022-2042 Strategy replaces the previous 2016-2035 Strategy by setting out a framework for investment in transport infrastructure and services for the GDA up to 2042. The Transport Strategy recognises a wide range of challenges for transport underpinned by climate change; the Covid 19 pandemic; servicing the legacy development patterns; revitalising city and town centres; transforming the urban environment; ensuring universal access; serving rural development; improving health and equality; fostering economic development; and delivering transport schemes.
- 5.9.2. The overall aim of the Transport Strategy is *“to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports the regional economy.”* The four objectives to deliver this aim are an



enhanced natural and built environment; connected communities and better quality of life; a strong sustainable economy; and an inclusive transport system.

- 5.9.3. It is stated that the most important actions that can be taken to serve the rural hinterland of the GDA are through the maintenance and improvement of the regional bus system, Local Link and the development of the Inter-Urban and Greenway cycle network, together with the maintenance and improvement of the critical road links that form the transport arteries of rural areas. The Transport Strategy incorporates a suite of measures which supports these items and addresses the mobility needs of the rural parts of the GDA.
- 5.9.4. It is also recognised that European sites may be vulnerable to greenway/cycleway developments due to their location and that amenity and leisure activities are already posing an existing level of threat and pressure to various European sites within the Greater Dublin Area. The feasibility and determination of each route is therefore subject to presenting no significant adverse effect(s) to the integrity of European sites, alone or in combination with other plans or projects.

#### **5.10. Greenways and Cycle Routes Ancillary Infrastructure Guidelines – Department of Transport, Tourism and Sport, July 2018**

- 5.10.1. This document provides guidance on the necessary ancillary infrastructure to bring a greenway to life and to make it an attractive and enjoyable experience for users. It is stated that a greenway route should be safe and should offer an attractive and pleasant experience. Good scenery, opportunities to visit local attractions, places for rest/ refreshment, accessibility via public transport, due consideration of individuals with disabilities, signposting, ease of use and good maintenance are important considerations that should be included.
- 5.10.2. The Guidelines set out details on trailheads, rest areas, seating, picnic tables, cycle parking, bike repair and charging stations, pocket recreation, commercial provider space, connections, lighting, public toilets, access controls, wind breaks and route user counters. Signage principles state that signs should be conspicuous, legible, coherent and functional. They should present options and opportunities along the

route and inform participants of the norms of route use. It is noted that the experience is enhanced if there is a sense of a journey, a link with the community, history, or landscape of the area.

**5.11. Strategy for the Future Development of National & Regional Greenways, Depart. of Transport, 2018**

- 5.11.1. It is an objective of this Strategy to assist in the strategic development of nationally and regionally significant Greenways in appropriate locations constructed to an appropriate standard in order to deliver a quality experience for all Greenways users. It also aims to increase the number and geographical spread of Greenways of scale and quality around the country over the next 10 years with a consequent significant increase in the number of people using Greenways as a visitor experience and as a recreational amenity. The Strategy recognises that there is potential where greenways are along natural corridors for people to access and learn about nature and natural heritage.
- 5.11.2. It is stated that greenways should meet satisfactory standards of width, gradient and surface condition and should ideally be at least 20km in length and ideally closer to 40km. The TII Standard for off-road cycleways will be used for greenways and the NTA's Cycle Manual should be used for links on urban roads. Gradients should generally be 3% and asphalt surfacing is popular because of its evenness & high skid resistance. Dust path construction or other loose material construction may be the preferred option in order to blend with the environment.
- 5.11.3. It is advised that successful greenways have buy in and local support. The preferred model is for use of lands already in undisputed ownership or controlled by the State. Impacts on adjoining agricultural lands should be considered and a code of conduct for greenway users should be provided. Greenways should be designed to take account, and avoid where necessary, the sensitivities of natural heritage, and they can include measures to enhance biodiversity, as well as providing an important resource for both locals and visitors.
- 5.11.4. Public consultation guidelines are set out in Appendix 1 of the Strategy. This includes study area public consultation, route options consultation, preferred route corridor consultation, and preferred route consultation (meetings with individual landowners effected).

5.11.5. National and regional greenways funded under this strategy are required to be Scenic, Sustainable, Substantially Segregated and Shared Use, Strategic, and offer lots to See and do, ('Five S' criteria).

**5.12. Code of Best Practice for National and Regional Greenways, 2021**

5.12.1. This code is prepared in accordance with the above Strategy to provide information on the process involved in planning, designing and constructing national and regional greenways. It includes an overview of public consultation processes, constraints study, route selection and statutory processes, as well as information about the use of State-owned lands and acquisition of private lands for greenways.

5.12.2. The Code includes advice of General Provisions including the appointment of a project liaison officer, accommodation works including fencing and boundary treatment and land acquisition. Appendix 1 comprises a Code of Practice for the Prevention of the Spread of Animal Disease and a schedule of rates for site investigations and archaeological testing is set out in Appendix 2.

**5.13. Rural Cycleway Design (Offline and Greenway) DN-GEO-03047, TII, August 2022**

5.13.1. This Design Standard provides advice and requirements regarding the planning, design, and development of rural offline cycleways, including national and regional greenway infrastructure.

5.13.2. In terms of planning for rural cycleways (offline & greenway), reference is made to public transport integration; park and cycle; villages, town and cities integration; and everyday journeys. Development principles are set out for rural cycling facilities on coherence, convenience, directness, safety, comfort, attractiveness and access.

5.13.3. Where the use of existing local or undesignated road infrastructure forms part of the mainline cycleway corridor, Departure approval is required from TII, where the designer shall outline and demonstrate the measures to be implemented to make the intervention suitable for inexperienced cyclists. Measures are included for designers to evaluate the suitability of undesignated road infrastructure.

5.13.4. Design considerations are set out in Section 4 of the document to include issues relating to segregation of walking and wheeling from cycling where necessary; safety

and quality audits; and inclusive design/ safety and security. Table 4.2 and associated sections set out rural cycleway (offline and greenway) design requirements for design speed, sight distances (junctions and overtaking), horizontal and vertical alignment, camber, cross sections, clearance and headroom, cycleway terminals and transitions, drainage, signage and road markings, lighting, ducting, and environmental considerations, landscaping and environmental integration.

5.13.5. Section 5 of the document considers further the interaction between rural offline cycleways and the public road in terms of road/ cycleway junctions and crossings. Minimum requirements with respect to greenway ancillary infrastructure is set out in Section 6. It is stated that the opportunity to take advantage of existing facilities (sanitary, bike repair services, etc.) at population settlements shall be seized where possible. Section 7 focuses on pavement and foundation construction details and Section 8 covers rural cycleway monitoring and evaluation. Maintenance and management are addressed in Section 9. Appendix A includes procedures for undertaking safety and quality audits of greenways.

#### **5.14. Cycle Design Manual, September 2023**

- 5.14.1. The 2011 National Cycle Manual is now replaced by this new Cycle Design Manual, which draws on the experience of cycle infrastructure development over the past decade and international best practice to help deliver safe cycle facilities for people of all ages and abilities. The Manual is intended as a live document that will be updated to reflect emerging best practice.
- 5.14.2. Chapter 2 of the Manual sets out the five main requirements (safety, coherence, directness, comfort and attractiveness), that designs should fulfil to cater for existing cyclists and to attract new cyclists to the network. Key design principles include a network approach, segregation and inclusive mobility. It is advised that promoters of cycle facilities should cycle. Information is also provided on the types of cycle vehicles, cycle links, appropriate facilities and width calculations.
- 5.14.3. Chapter 3 of the Manual addresses cycle network planning, as well as the planning of cycling in private developments and public infrastructure projects. Designing for cycling is covered in Chapter 4, with guidance provided on the following:

- Geometric requirements (design speed, sight distance, visibility splays, horizontal and vertical alignments, surface crossfall, clearance and headroom),
- Cycle links (segregated cycle facilities, standard and stepped cycle tracks, protected cycle lanes, two-way cycle tracks, greenways and shared active travel facilities, cycle lanes, cycling in mixed traffic, contraflow cycling, parking and loading on links, bus stops, transitions, pedestrian crossings at cycle tracks),
- Priority junctions,
- Signal-controlled junctions (including protected junctions),
- Crossings,
- Roundabouts.

5.14.4. It is stated that greenways should be sealed and machine laid and that lighting will help users to access the route at all times of day throughout the year. The Manual notes that frequent access points connecting to adjacent roads can help improve connectivity and feelings of safety to ensure motor traffic-free routes provide a high level of service for utility cycling. Other advice is set out in terms of segregation, width, speed control measures, access controls and shared usage.

5.14.5. Details relating to implementation and maintenance, including public lighting and signage/ wayfinding, are provided in Chapter 5. Chapter 6 sets out the various design principles on cycle parking. Finally, typical layouts for cycle infrastructure are included in the appendix.

## 5.15. **Design Manual for Urban Roads and Streets, 2019**

5.16. This Manual seeks to provide guidance on how to approach the design of urban streets in a more balanced way. It sets out an integrated approach to promote better street design by slowing traffic speeds and by encouraging careful place making, quality public realm, and walking and cycling. The principles, approaches and standards set out in the Manual apply to the design of all urban roads and streets with a speed limit of 60 km/h or less.

## 5.17. Wicklow County Development Plan, 2022-2028

- 5.17.1. Blessington is designated as a self-sustaining growth town within the Core Strategy for Co. Wicklow. It is noted that the settlement acts as a service centre for a wide rural catchment including the villages of Lacken, Ballyknockan and Valleymount. The Council will strive to reclaim and reassert the Main Street as a place for people during the lifetime of the Development Plan. Poulaphouca Reservoir is also recognised as an important asset for the town and its surroundings and work on extending the greenway around the reservoir is intended to be completed within the lifetime of the Development Plan. It is stated that this will contain car parks, toilets and refreshment facilities.
- 5.17.2. It is a policy of the Council (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.”* For Blessington, it is the aim to regenerate the town centre to include reclaiming the Market Square as an amenity space and focal point for the town, providing public realm improvements, addressing dereliction, providing remote working / enterprise hub, repurposing the former HSE building to create a visitor centre for the Blessington e-Greenway and significantly improving permeability and sustainable mobility. Delivery of the inner relief road is recognised as a key element in realising the revitalisation of the town by removing excessive traffic volumes.
- 5.17.3. Chapter 11 of the Development Plan addresses tourism and recreation. Section 11.2.3 notes that greenways are significant tourism assets that create opportunities to improve the health and wellbeing of the local population. It is also stated that these facilities boost the appeal of a place, add value to the tourism offering and facilitate year-round tourism activities. In this regard, the extension of the Blessington Greenway to a 43km route of walking and cycling incorporating the villages of Ballyknockan, Valleymount and Lackan is recognised as an important piece of tourism infrastructure that will provide economic and social benefits to the County. The following tourism and recreation policies relate directly to the Blessington Greenway:

*CPO 11.30 In conjunction with Fáilte Ireland, to support the development of Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany, Blessington, Baltinglass,*

*Enniskerry, Kilcoole, Newtownmountkennedy, Rathdrum and Tinahely – Shillelagh - Carnew (south west Wicklow) as tourism hubs.*

*CPO 11.31 To support and promote the development of rural towns and villages, particularly those distant from the largest centres (as detailed in Objective 11.30) such as in west and south west Wicklow, as local tourism hubs particularly with respect to the provision of accommodation and service bases for outdoor recreation activities.*

*CPO 11.35 To support the development of a strategic national network of walking, cycling, horse riding and water-based trails.*

*CPO 11.36 - Support and facilitate the delivery of the Blessington Greenway and the South Wicklow Greenway Arklow to Shillelagh including facilities ancillary to these routes (such as sign posting, car parks) and the development of linkages between these trails and other local routes.*

*CPO 11.37 - To support and promote the development of tourism infrastructure, services and accommodation located so as to service and support users of the Blessington Greenway and future extensions thereto, in particular (but not limited to) those located in the following settlements – Blessington, Ballyknockan, Lackan and Valkeymount – with particular support for developments that include the renovation of existing building stock, especially historic / vernacular buildings.*

*CPO 11.43 To promote and encourage the recreational use of coastline, rivers and lakes and the development of 'blueways' in the County subject to normal environmental protection and management criteria. Where such recreational uses involve the development of structures or facilities, the Planning Authority will ensure that the proposals will respect the natural amenity and character of the area, listed views and prospects onto and from the area in question. Where possible, such structures should be set back an appropriate distance from the actual amenity itself and should not adversely affect the unique sustainable quality of these resources.*

*CPO 11.46 To support the development of the following outdoor recreation hubs/clusters – Glendalough, Rathdrum, Blessington-Baltinglass, Tinahely-Shillelagh and East Coast Maritime.*

*CPO 11.50 Where relevant, the Council and those receiving permission for development under the plan, shall manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities; visitor/habitat management plans will be required for proposed projects as relevant and appropriate.*

*CPO 11.51 Ensure the potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.*

*CPO 12.21 To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular...inter alia... to promote the Luas extension from City West / Tallaght to Blessington; to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus service / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations; to encourage the improvement of bicycle parking facilities at all transport interchanges; to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; to support the development of bus shelters and bicycle parking facilities where possible; and to promote and support the development of fully accessible public transport services and infrastructure, that can be used by all people, regardless of their age, size, disability or ability.*

*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 infrastructure on Blessington Main Street and surrounding town centre local road network.*

*CPO 13.15 In order to fulfil the objectives of the Core Strategy, Wicklow County Council will work alongside and facilitate the delivery of Irish Water's Water Services Investment Programme, to ensure that all lands zoned or identified for*



*development are serviced by an adequate wastewater collection and treatment system and in particular, to endeavour to secure the delivery of regional and strategic wastewater schemes. In particular, to support and facilitate the delivery of new / improved wastewater treatment plants in the following settlements: - Arklow - **Blessington** - Aughrim - Tinahely - Avoca - Laragh – Glendalough - **Lakes area around Blessington** - Large and Small Villages.*

*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 air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan<sup>1</sup>.*

*CPO 17.20 Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged.*

*CPO 18.11 To support the development of greenways, blueways and other access routes along natural corridors while ensuring that there is no adverse impact on the flora and fauna, biodiversity or water quality of natural assets. Wicklow County Council prioritises environmental protection in our design and construction of routes and surface selection. In particular, to support the development of existing and examine the feasibility of new walking, cycling, horse riding and water based routes and trails along the following routes:.... the extension of the 'Blessington Greenway' walk around the Poulaphuca reservoir.*

- 5.17.4. Potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.

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<sup>1</sup> Except as provided for in Article 6(4) of the Habitats Directive, viz. there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) adequate compensatory measures in place.

5.17.5. It is stated that as new employment opportunities develop in the County, particularly in the Key Towns and Self-Sustaining Growth towns of Bray, Greystones-Delgany, Wicklow Town - Rathnew, Arklow and Blessington, the challenge will also be to make these towns more accessible by public transport.

5.17.6. The proposed greenway will pass through Blessington Architectural Conservation Area. There are protected views along the proposed greenway at the R758 Annacorney, Valleymount (view north-eastwards of Poulaphuca Reservoir), and at the N81, Burgage More, south of Blessington (view of Poulaphuca Reservoir and inlet). Prospects of Special Amenity Value or Special Interest continue along the western lakeshore (N81 at Russborough - Prospect of Russborough House, Russeltown park and towards Poulaphuca Reservoir), and along the eastern lake shore (R758, L8369, L4364 & L4365, Lake Drive from the N81 at Glashina to Oldcourt - Prospect of Poulaphuca Reservoir). The Blessington Lakes area forms part of "The Mountains and Lakeshore Area of Outstanding Natural Beauty".

#### **5.18. Kildare County Development Plan, 2023-2029**

5.18.1. A small section of the proposed greenway is location within Co. Kildare along the N81. This section is a designated scenic route in the Development Plan.

#### **5.19. Draft Blessington Local Area Plan, 2025**

5.19.1. The draft Blessington Local Area Plan, 2025 is on display with submissions invited from 30<sup>th</sup> October 2024 to the 11<sup>th</sup> December 2024.

## **6.0 Consultations**

6.1. The application was circulated to the following bodies:

- Dublin City Council
- Wicklow Mountains National Park
- Development Applications Unit - Department of Housing, Local Government and Heritage
- Kildare National Roads Office
- Inland Fisheries Ireland

- Fáilte Ireland
- An Taisce
- Heritage Council
- The Arts Council
- Transport Infrastructure Ireland
- Irish Water
- Kildare County Council Planning Department
- Heritage Officer, Wicklow County Council
- National Transport Authority
- Minister of Transport, Eamon Ryan
- Minister of Housing, Local Government and Heritage, Darragh O'Brien
- Department of Transport

6.2. The following responses were received by the Board:

6.3. **Department of Housing, Local Government and Heritage**

6.3.1. The following heritage related recommendations for the proposed development were received by the Board from the Department:

Archaeology

- Copy of Archaeological Impact Assessment (AIA) was not provided for review. Unclear from summary if AIA was completed by suitably qualified and experienced archaeologist.
- No reference made to the high potential for underwater/ reservoir foreshore archaeological remains to survive along the shore and at proposed bridge crossings.
- No detailed archaeological strategy and programme of archaeological mitigation measures provided to ensure protection of both terrestrial and underwater archaeology.

- Detailed archaeological strategy should be developed and submitted to National Monuments Service well in advance of site preparation and/ or construction works and preferably in advance of any planning decision.
- Recommended that Wicklow County Council prepare AIA and detailed archaeological strategy that may include archaeological testing of the foreshore/ underwater archaeological survey.
- Mitigation measures to include preservation in situ and/ or recording shall be suggested in the AIA and National Monuments Service will advise further upon receipt of same.
- Developer should have regard to “*Framework and Principles for the Protection of Archaeological Heritage, 1999*” with respect to preservation of archaeological heritage.

#### Nature Conservation

- Portion of the proposed development (c. 5%) is within Poulaphouca Reservoir SPA.
- Unclear where lesser black-backed gull roosts or feeds – further investigation necessary to determine this to assess impact at all project stages and provide adequate mitigation, if necessary.
- CEMP and EcIA contain disturbance mitigation measures for SCI birds, including the limitation of works at dawn and dusk – unclear why this is required if there are no likely significant effects on these species from disturbance.
- CEMP states that “areas identified as grazing/foraging habitat for Greylag Geese will be mapped and recorded by the onsite ecologist. Works will be programmed to avoid any unnecessary or avoidable impacts in these areas.” This information should be collected in time to inform appropriate assessment as required by law.
- Disturbance impacts to SCI species requires further consideration.
- Impacts of hydrocarbon pollution through the expansion of Russelstown and Knockieran car parks should be assessed and mitigation such as hydrocarbon

interceptors and nature-based solutions to rainwater and surface water run-off should be considered.

- Impact of dog fouling on water quality must be assessed as well as any loss of floodplain, which naturally attenuates surface water.
- Otter territories can be over 13km in length along watercourses and therefore otter will be found both within and outside of the Wicklow Mountains SAC. Screening for appropriate assessment must consider indirect impacts to European Sites via impacts to species for which a site has been designated beyond the site where this might affect the conservation objectives.
- Appropriate Assessment Screening Report states that no otter holts occur in close proximity to the proposed route. EclA states that possible holts were recorded within wetland habitat and suggests a boardwalk.
- EclA states that clearance of shoreline and bankside vegetation and habitat within 5m of the shoreline can have negative impacts on otter and mitigation in this regard is provided – Department considers that the proposal is likely to have significant effects on the SAC due to the presence of otter.
- EclA states that survey timing was sub-optimal for mammals as higher vegetation during summer makes refugia harder to detect – comprehensive otter survey covering all areas within the zone of influence of the proposed development must be carried out to inform the appropriate assessment.
- Dogs roaming off lead may be a source of considerable disturbance at operational stage – suitable mitigation must be put in place based on survey results.
- Appropriate Assessment Screening Report and NIS should consider any impact of the initial 6km trail in combination with the proposed development. Impacts of tree felling and rock armour should also be considered.
- eGreenway should be considered a new public road with all the inherent threats to biodiversity a significant road project brings – there is a need to strategically plan, deliver and manage the eGreenway to ensure infrastructure is appropriately designed to reduce the impact on the natural environment.

- 'No net loss' of biodiversity is an action under the National Biodiversity Action Plan, 2017-2021. There will be direct loss of several habitats, some of which are of international importance – important that there is an adequate ecological baseline in order to assess impacts and provide appropriate mitigation and compensation measures. No estimation of the amount of individual habitats lost to the development or spatial extent of impact.
- Recommends that hydrological study includes an assessment of any loss of floodplain and compensation measures.
- TII recommends that use of cylindrical culverts on smaller watercourses used by otter should be avoided.
- Tree planting with equivalent numbers of trees to be lost may not provide adequate compensation for the loss of mature woodland habitat. Alternatives such as existing woodland restoration should be considered.
- Mitigation and compensation measures must include adequate detail in order to ensure success, e.g. with respect to translocation of grassland turves.
- Concern that recreational disturbance impacts have not been properly assessed – disturbance to birds and mammals by dog walkers may require to be monitored during the operational phase.
- First obligation for strict protection of species protected under the Habitats Directive (92/43/EEC) is to avoid any impacts to animals, their habitat, breeding or resting places. Proposal includes the removal of over 7,000 trees, some of which are likely to harbour bat species – surveys must be adequate to determine impacts.
- Given surrounding land is in state ownership, it should be possible to avoid destruction of badger setts through alteration of the route.
- Reliance of number of indicator herb species to define Annex I priority habitat 91E0 Alluvial Forest is erroneous – recommended that this habitat is subject to further field survey at appropriate time of the year to determine whether Annex I priority habitat Alluvial Forest is present.

- Recommends that the presence of tufa forming springs/ seepages within the development footprint is investigated further.
- Recommends that a Marsh Fritillary survey takes place to confirm presence/ absence within proposed development site so that suitable mitigation is put in place.
- Recommends that a supplementary rare plant survey is conducted at a suitable time of the year so that areas containing rare plants can be avoided.
- Early flowering plants may have been missed in the August 2020 survey – such species should be covered in supplementary rare plants survey.
- Recommends that control or management of invasive species be undertaken in accordance with the relevant TII technical guidance.
- Recommends that a Management and Maintenance Plan for the eGreenway should be established with the protection and enhancement of biodiversity at its core and to ensure that inappropriate practices such as the use of herbicide and excessive cutting regimes are avoided. Grasslands should be left in their current state and natural vegetation present in the seed bank will establish itself over time following mowing and removal of mowed grass. Recommended that mowing plan be developed.
- Recommends that SuDS are considered where possible, e.g. nature-based rain gardens and tree pits.

#### **6.4. Dublin City Council Water Service**

6.4.1. A submission from Dublin City Council acknowledges the many positives of the proposed development but sets out the following issues that require further information to minimise the pollution threats to raw water in the reservoir:

- Proposals to deal with surface water run-off during construction and when the greenway is completed.
- Details of surface water attenuation proposals during the construction of bridges and culverts to be developed.

- Details of proposed car parking in particular the 50 no. spaces at Russeltown right on the water edge near the water treatment plant intake, as well as the 50 no. spaces and 6 no. bus spaces at Knockieran – proposed finishes and any attenuation proposals for additional run-off.
- Details of any proposed welfare facilities including toilets and how waste percolation facilities may be responsibly sited adequate distances away from the reservoir and feeder streams.

6.4.2. It is noted that half the water from the Greater Dublin Area is supplied from this source and as a result the purity of the water is vital to the region. Dublin City Council objects to the proposed development until the above further information is provided in a satisfactory manner.

## 6.5. **Fáilte Ireland**

6.5.1. Fáilte Ireland is extremely supportive of the proposed greenway from a tourism perspective. The following points are also raised in this submission:

- Proposal provides a strategic link between various villages and a greenway of scale for Counties Wicklow and Kildare.
- Proposed project is well positioned to be attractive at enticing both local and overseas visitors.
- Proposal aligns with Fáilte Ireland's strategy pillar Opening the Outdoors – Transform Ireland's outdoor tourism experience.
- Greenways are a key tourism infrastructure that support the development of rural communities and job creation, as well as the promotion of natural assets and biodiversity.
- Research by Fáilte Ireland has outlined visitor preferences for greenways that provide scenery, segregation, safety and see and do – proposal would deliver all of these.

## 6.6. **Irish Water (Uisce Éireann)**

6.6.1. The following comments were received by Irish Water:



- Welcomes and supports the provision of sustainable development like the proposed greenway.
- Proposed route will pass a number of substantial Irish Water owned assets and the protection of the reservoir as a drinking water source is of national importance.
- It is Irish Water's policy to maintain safe and secure drinking water supplies and that no development that will contaminate the IW drinking water source at Blessington should be granted permission, including wastewater treatment systems and one-off houses.
- Irish Water is currently preparing a Drinking Water Safety Plan for each of our Drinking Water Supplies in line with the Water Framework Directive and in accordance with EPA Drinking Water Advice Note No. 8. Until such time as the DWSP is completed for Poulaphouca Reservoir, Wicklow County Council should continue with current practices.
- No consideration as to the potential impacts the proposed development could have on Irish Water owned assets in the area, in particular the drinking water abstraction point at Poulaphouca Reservoir.
- On review of the Appropriate Assessment Screening Report, Irish Water has serious concerns over the potential impact the proposed development could have on Poulaphouca Reservoir, in particular the drinking water abstraction source.
- Assessment on minor watercourses has been carried out in the context of SAC designation – does not appear to be any consideration of what impact the proposed development will have on water quality.
- Recommends that an assessment is undertaken to assess the development's potential to impact on the reservoir as a drinking water source and any site-specific measures to mitigate any potential impacts.
- Proposed development should not impact waters used for the abstraction of drinking water nor cause any deterioration of water quality pre, during and post works.

- Applicant should engage with Irish Water diversions section to assess feasibility of build over and/ or diversion relating to the proposed development.
- Irish Water will review the finalised EIAR as part of the planning process – includes scoping opinion in relation to water services.

## 6.7. Kildare National Roads Office

- 6.7.1. It is stated in this submission that the impact of increased traffic on the national road network is negligible. It is also noted that the proposal will not have an adverse impact on the development of a route within the Preferred Route Corridor for the N81 Hollywood to Tallaght Road Improvement Scheme.

## 6.8. Public Submissions

- 6.8.1. A total of 290 submissions were received by the Board on the application. A full summary of all third party submissions is contained in Appendix 1.
- 6.8.2. Many observers were in favour of the greenway subject to amendment and others unconditionally supported the greenway or were against it. In general, the main points of objection to the proposal raised in submissions are as follows:

Issue Raised	Approx. no. of submission referencing this issue
Traffic lights on existing bridges	239
Lack of public consultation	137
Toilets (adequacy of provision)	104
Traffic impact (during construction and post development)	97
Car parking (adequacy of provision for facility)	94
Environment (adequacy of archaeology and environmental assessments, impact on wildlife and ecology)	70

Fencing	38
Impact on trees	25

### *Contamination*

- No provision of toilets along the route and potential for pollution of lake.
- Potential for contamination of drinking water.
- Laying of asphalt/ tarmac will lead to considerable pollution of reservoir.
- Concerns with the proposed excavation and drainage proposals and potential impact on adjoining property.

### *Traffic & Transport*

- Proposal for traffic lights and one-way system on 3 no. bridges around the lake will cause delays/ obstruction for motorists, farmers and emergency services. Alternative proposals for bridges should be explored.
- Lack of consultation with emergency services about their ability to access the area at speed.
- Traffic surveys were carried out during lockdown and proposal will bring increased levels of traffic to local roads from c. 300,000 visitors per year.
- Potential for conflicts between cyclists, pedestrians and residents on shared path through Blessington.
- Objections to removal of parking on Blessington Main Street. Proposal could also cause problems for deliveries.
- Speed limit in Blessington should be reduced to 30kph.
- Inadequate parking provided for the greenway.
- Tulfarris spur includes a very steep hill which has a gradient outside the parameters for cycleways as advised by TII. There is also a bad sight line at the dog-leg corner.
- Disturbance from construction works and traffic.

- No consideration given to access for the disabled.
- Potential safety issue on proposed greenway from speeding cyclists.
- Visitors should be encouraged to use public transport to access the greenway and bus stops should be provided at access points.

### *Ecology*

- Proposed development encroaches upon the SPA on numerous occasions – no definitive line of drawings to show European Sites.
- Proposed development will adversely affect the integrity of the site and will have a devastating effect of the SPA.
- Concerning that no species specific surveys were carried out for QI species.
- In-combination assessment does not include rowing facility, which now appears to be the subject of judicial review.
- Proposal will see placement of rock armour and extensive tree removal with no local reinstatement – difficult to understand statement that no impacts to conservation interests or habitats thereof are likely to arise.
- Objections to removal of over 7,000 trees.
- Wholesale destruction of trees will destroy habitat of red squirrel and pine marten.
- Little reference to noise disturbance during construction and in particular the construction of the bridge and installation of rock armour.
- Concerns regarding disturbance and destruction of habitat.
- Lighting should not disrupt wildlife.
- Project should be subject to full EIA.

### *Climatic*

- It will take decades to off-set the carbon emissions from loss of trees with replanting.
- Visitors driving to greenway will increase greenhouse gas emissions.

### *Design*

- Softer surface with compacted stone would be more appropriate than tarmac for greenway.
- Greenway should be kept off public roads.
- Potential for complete refurbishment of Blessington Main Street with possible part pedestrianisation.
- There should be better links from Blessington to the reservoir and large section of lakeshore has been left out of the greenway.
- Use of rock armour should be minimised.

### *Safety & Security*

- Suitable fencing required along greenway to prevent trespass and dogs attacking livestock.
- Concerns regarding safety, security, littering and management of proposed greenway.
- Loss of screening for privacy and wind shelter from removal of trees.

### *Archaeology*

- Insufficient care taken to identify and preserve local archaeological heritage.

### *Procedural*

- Plans provide little detail on what is proposed to be constructed.
- Not all watercourses shown on application drawings.
- Rights of way to water's edge is not shown on planning application drawings.
- Application is non-compliant with Regulation 249(a) of the Planning and Development Regulations, 2001 and should be returned as invalid.

### *Consultation*

- Lack of consultation and input from local councillors.

## **7.0 Further Information**

7.1. In accordance with Section 177AE(5)(a) of the Planning and Development Act, 2000 (as amended), the Board requested the applicant to submit further information on the application on matters relating to (i) the likely effects on the environment, (ii) the likely consequences for the proper planning and sustainable development of the area, and (iii) the likely significant effects of the proposed development on any European sites.

7.2. The further information request is included in Appendix 3 of this report. As well as responding to each of the 18 items in the further information request, the following documents were submitted to the Board as part of the applicant's FI response:

- Traffic and Transport Assessment Report
- Road Safety Audit Report
- Quality Audit (including Stage 1 RSA) Report
- Technical Note on Parking Arrangements on Blessington Main Street
- Outline Maintenance and Management Plan
- Monitoring and Evaluation Plan
- Blessington Car Park Drainage Summary Report
- Spatial Extents of Habitat Lost & Woodland Restoration Report
- Bat Report
- Fauna Report
- Annex I Habitats and Rare Flora
- Landscape Plan
- Proposals for Monitoring Bird Disturbance at Poulaphouca
- Public Consultation and Communication Report
- Climate Impact Assessment Report
- Briefing Note on Archaeology Mitigation

- Response to ABP Submissions
- Appropriate Assessment Screening Report and Natura Impact Assessment

7.3. A summary of each of the above documents is contained in Appendix 4 of this report.

7.4. The applicant's response to each of the further information items is summarised as follows:

Item 1 – Preliminary nature of drawings:

- Set of supplementary drawings prepared to offer enhanced clarity and details of the envisaged works and including more accurate engineering details; land ownership details; levels, cuttings and embankments; rock armour; bridge structures; fencing; junction design and signage; watercourses; drainage; landscaping; and specifics regarding car park extension and facilities.

Item 2 – Rights of way to the shoreline:

- All relevant rights of way identified from Land Direct portal. Drawings outline measures for maintaining continued access to only right of way at Lacken without disrupting the safe operation and free flow of the greenway. Ongoing engagement with relevant parties planned.

Item 3 - Traffic Assessment and surveys

- Transport and Traffic Assessment dated December 2023 prepared, which includes updated traffic surveys carried out in 2023. Concludes that road network can satisfactorily accommodate the increase in traffic during the operational phase.

Item 4 – Sustainable transport access:

- Refer to Transport and Traffic Assessment. Wicklow County Council committed to actively promoting and supporting the delivery of additional bus services in the region and will advocate the use of existing buses and encourage the shared use of vehicles.

Item 5 – Rural Cycleway (Offline and Greenway) Design Requirements:

- Drawings have been developed with reference to these standards. Updated Road Safety Audit and Quality Audit have been carried out. Greenway will be accessible and useable for all levels of ability and crosswinds were not identified as a concern in the Road Safety Audit, largely due to the sheltered nature of much of the route passing through forest plantations. Stage 2 Road Safety Audit will address any potential crosswind hazard that may arise during the operational phase.

Item 6 – Gradient at Tulfarris section:

- WCC has decided to redesignate the Tulfarris section as a ‘link route’ – revised drawings include details of measures to warn motorists of vulnerable road users.

Item 7 – Compliance with DMURS through Blessington:

- Technical note prepared on parking arrangements on Blessington Main Street, which outlines safe travel measures including raised tables along quiet routes to slow traffic. Refers to proposals to develop a ‘Town Centre Regeneration Scheme for Blessington Town Centre’ which aims to deliver streetscape enhancement in accordance with DMURS.

Item 8 – Greenway facilities:

- Blessington will serve as a primary trailhead and toilets already exist in the town. There are plans for additional toilets at the proposed Blessington hub, which will also feature a tourist office, community meeting room, and changing facilities. Amenities and facilities, including toilets are available in settlements along the route, and this is expected to foster interaction with the greenway’s development, contributing to the support of local economies.
- Layout drawings depict desirable amenities, points of interest and rest areas, including those identified in the Blessington Heritage Trail Map.

Item 9 – Greenway Management Plan

- Outline Maintenance and Management Plan developed, which will undergo further development and refinement prior to opening. Includes information on operational management structure, greenway management duties, financial



recourses, inspection and maintenance plan activities, monitoring, complaint management and resolution, code of conduct, control of dogs, water safety, operational hours, severe weather response plan, emergency response plan, and trail accreditation and insurances.

- Maintenance and management plan also included in the submission, which will provide a robust framework for effective and safe operation of the greenway.
- Most fencing along the route will remain unaltered. Engagement will involve case-by-case review of boundaries to understand each individual stakeholder's requirements – primary goal is to prevent trespass and create a secure environment for all.
- Boundary treatments will adhere to the 'Code of Best Practice for National and Regional Greenways' and unique characteristics of each property will be recognised. Council will draw upon fencing types already established by TII.
- No set operational hours but assumed that greenway will be used during laylight hours. Car parks will typically be open 9am to 8pm in summer and 9am to 5pm in winter. WCC will regularly evaluate these hours.
- Maintenance and Management Plan takes into account measures for controlling dogs – list of responsibilities for dog owners set out in accordance with The Dog Control Act, 1986, as amended and The Control of Dogs Regulations, updated 2023.
- Recognises the dangers and nuisance of dog faeces to greenway users and of barking dogs frightening and dogs chasing livestock.
- WCC will provide appropriate signage regarding the control of dogs and will install receptacles for faeces, whilst monitoring compliance with dog control measures.
- Emergency Access Plan will be developed in accordance with Maintenance and Management Plan – vehicular access will be restricted, allowing entry for designated personnel and emergency services. Emergency access points

identified on drawings, and these will be controlled by locked chicanes/ demountable bollards.

- A greenway users code will be developed to provide specific advice for cyclists and pedestrians concerning interaction with animals, wildlife and the environment – will contain advice for all users, cyclists and pedestrians, and for planning ahead and being considerate of others, farm animals, wildlife and property, as well as waste disposal and water requirements.
- Monitoring and Evaluation Plan will contain objectives to maintain high quality standards

Item 10 – Drainage and water environment:

- Revised plans and profile drawings submitted of all known watercourses and ditches intersecting the greenway – Conceptual Culvert Design Standard Detail drawing provides crucial insights into the dimensions and types of structures intended for crossing these watercourses.
- Blessington Car Park Drainage Summary offers details of the drainage of car parks during the operational phase.
- Control measures and proposals for surface water run-off during construction set out in outlined CEMP.
- New toilets at the Blessington hub will be connected to established foul sewer network. No other trailheads along the route possess foul sewer connections and is near the SPA and waterbody that provides drinking water, leading to a decision not to include toilets in these specific locations. WCC aim to encourage utilisation of existing facilities in town and settlements along the route.

Item 11 – Response to Department of Housing, Local Government and Heritage:

- “Spatial Extent of Habitat Loss & Woodland Restoration” report has been carried out, which also details replacement planting and other habitat creation and management. Loss of habitat will be adequately compensated for in order to ensure ‘no net loss’ of biodiversity.

- As part of this report, habitat management and restoration measures include selective thinning, understorey and woodland edge planting, and a database of mature trees to be retained or protected.
- Field surveys were conducted in 2023, including a dedicated bat survey. Site evaluated as being of local importance – higher value and no long-term significant impacts predicted.
- Mammal surveys identified potential breeding areas for common frog; a number of badger setts (including one within works area); a single otter holt was found within the zone of influence of the proposed greenway works; and a number of red squirrel dreys were recorded – mitigation has been set out.
- No woodland habitat surveyed in August 2023 aligned with alluvial woodland based on site characteristics and the absence of a sufficient number of target and positive indicator species. “Annex I Habitats and Rare Flora” report submitted with FI response.
- Survey of springs and seepages carried out in December 2023 and none conformed to Annex I habitat 7220 Petrifying Springs with Tufa Formations.
- Rare plant survey carried out in 2023 and no rare, threatened or protected species found within scheme footprint. Species-rich grasslands found outside scheme footprint. No larval webs for Marsh Fritillary were found (see Fauna Report submitted as FI).
- Blessington eGreenway Landscape Plan has now been prepared, which provides details on management and maintenance actions necessary to protect and enhance landscape and biodiversity along the greenway – developed with reference to the All Ireland Pollinator Plan, 2021-2025.
- WCC will monitor greenway usage and implement an Environmental Monitoring Plan, specifically focused on the local bird population – surveyors will carry out a series of 4-hour surveys monitoring greenway activities and any disturbance to birds. Report titled “Proposal for Monitoring Bird Disturbance at Poulaphouca” submitted as FI.

Item 12 – Consultations:

- Report titled “Response to An Bord Pleanála RFI Item 12 – Public Consultation and Communication” dated January 2024 sets out details of consultations and communications conducted during the project. Most consultations were undertaken before issuance of Guidelines for the Strategy for the Future Development of National and Regional Greenways and the Code of Practice for National and Regional Greenways.

Item 13 – Climate Impact Assessment:

- Climate Impact Assessment submitted as FI. Total GHGs from constructing the proposed development are estimated to be 24,890 tCO<sub>2e</sub>, of which 17,753 tCO<sub>2e</sub> can be attributed to release of carbon from tree removal. This will be recouped throughout the lifetime of proposed replanted trees. Annual operational emissions expected to be approximately 4,123 tCO<sub>2e</sub>. Proposal considered to have proportionally small GHG emissions in the context of Ireland’s carbon budget.
- Climate Change Resilience assessment addresses chronic climate-related hazards and risks associated with increased severe weather events – does not present a significant risk to the proposed development with embedded controls in the design, construction and operation of the asset.

Item 14 – Archaeology:

- Consultation meeting held with DAU, TII and AECOM on 11<sup>th</sup> May 2023 and a “Briefing Note of Archaeological Mitigation” has now been prepared, which clarifies issues raised by DAU and includes a mitigation strategy for cultural heritage.

Item 15 – Fencing and screening details at W91 A2N1:

- 2m high screen proposed adjacent to greenway track on ESB lands. Supplementary planting and screening provided as required in accordance with the Landscape Plan.

Item 16 – Remaining issues from prescribed bodies and observers:

- Document titled “Response to ABP Submissions” responds to issues raised in submission received by the Board (see summary in Appendix).

#### Item 17 – Appropriate Assessment

- Comprehensive otter survey undertaken and arising from the further data gathered in 2023, the AA Screening and NIS have been updated. One otter holt recorded within the zone of influence of the scheme and a new suite of mitigation measures have been drawn up for the NIS.
- Considered that no significant in-combination impacts will arise that have not already been detailed in the AA Screening and NIS – possibility of in-combination impacts with existing route areas and activities associated with the scheme and reservoir was reviewed.

#### Item 18 – Other AA issues:

- No other issues that have not been addressed already in FI response.
- Changes to the NIS document were required arising from further surveys and studies carried out in the provision of FI.

## **8.0 Response by Public Bodies to Applicant's Further Information Submission**

- 8.1. The Board decided that the further information contains significant additional data in relation to the likely effects on the environment of the proposed development, the likely consequences for proper planning and sustainable development, and the likely significant effects on a European site. Following publication of new notices, submissions or observations in relation to the further information were received from the following public bodies:

### **8.2. Department of Housing, Local Government and Heritage**

#### Archaeology

- Having reviewed the Archaeological Impact Assessment and FI, the Department advises on conditions to be attached to any grant of permission

pertaining to mitigation; appointment of a project archaeologist; pre-development archaeological testing of replanting areas; inclusion of archaeological or cultural constraints in CEMP; and submission of a final archaeological report.

#### Built Heritage

- Welcomes development of this key community recreational infrastructure in the context of the scenic Blessington Lakes and adjoining historic villages and settlements.
- Department concerned that there may be objects of built heritage significance (such as boundary walls, granite copings, piers, etc.) that are strewn around the villages along the shore of the lake. Opportunity to integrate new stone elements in the tradition of the area as a way to mitigate the impact of new infrastructure should be considered.
- Input of conservation architect recommended and interventions to the cultural landscape should have regard to protected views and vistas and the setting of Russborough House.

### 8.3. Dublin City Council Water Services

- Additional information lacking on proposals to deal with surface water runoff during construction.
- No updated outline CEMP provided.
- Additional information required on proposals to deal with surface water runoff from the Greenway when completed.
- No details of surface water attenuation proposals during the construction of bridges and culverts.
- Details provided on car parking is showing surface drainage being released to the lake. Car park extension at Russeltown car park will put further stress on an already stressed area subject to dangerous algae blooms.

- DCC objects to this proposal until such additional information is produced in a manner that satisfies and nullifies the concerns regarding the safeguarding of the above-mentioned resource.
- Water from reservoir is treated by DCC and Uisce Éireann and is supplying the majority of water to the Greater Dublin Area – half the water requirement for the GDA is supplied from this source and as a result the purity of the water is of national importance.

#### **8.4. Uisce Éireann**

- Protection of water from reservoir is of national importance.
- While in the greenway proposal has many positives and Uisce Éireann is generally supportive of the proposals, there are a number of issues that require clarification to ensure protection of the drinking water source.
- Additional information required on proposals to deal with surface water runoff during construction - no updated outline CEMP is being provided.
- Additional information required on proposals to deal with surface water runoff from the greenway and from Knockieran car park during operation - applicant requested to provide runoff rates that would be achieved and detailed plans for interceptors and attenuation mechanisms to achieve the runoff rates.
- Additional information required on water quality monitoring regimes for the reservoir and all connected waterbodies during construction and operation.
- Additional information required on intersections between greenway and Uisce Éireann infrastructure - build over of assets and separation distances is not permitted and proposals to divert existing water or wastewater services will need to be agreed.
- Additional information required on water and wastewater connections to support proposals - notes that there are no new toilet facilities and any proposals to discharge wastewater to public infrastructure require a connection agreement.

## **9.0 Response by Third Parties to Further Information**

- 9.1. Following publication of new notices, submissions or observations in relation to the further information were received from 199 parties. Of these submissions, 114 were from new observers. The remaining 85 parties also made submissions during the first round of consultation when there was a total of 290 submissions. A total of 34 of the 199 submissions were mainly in favour of the proposed greenway. Around 20-25 of the objections were generally in favour of the greenway but were against certain aspects of the proposal. It was apparent from the further information responses that certain observers are now more against the development of the greenway than the first round of consultation. Issues raised by the Board in its further information request formed the basis of many objections, as well as issues raised before.
- 9.2. The most frequent grounds for objection to the further information response was the proposal to install traffic lights and a one-way system for vehicles on the three bridges at Knockieran, Baltyboys and Valkeymount. This was raised on approximately 124 occasions for different reasons including traffic delay, emergency and agricultural vehicle access, bridge width and condition, and the alternative of installing boardwalks either side of the bridges to accommodate pedestrians and cyclists. It should be noted, however, that this issue of traffic lights on the bridges was not specifically raised by the Board in the further information request (see Appendix 3).
- 9.3. In terms of wider traffic and transport conditions, further information was requested on traffic surveys, sustainable transport access, road crossing details, compliance with DMURS, pedestrian/ cyclist conflicts in Blessington, and the suitability of the Tulfarris section for the greenway. The suitability of the Tulfarris link was raised in approximately 39 third party further information responses. General traffic concerns relating mostly to the private car journeys and road safety were raised in approximately 57 occasions. There were concerns regarding the volumes of traffic that would be attracted to the greenway and whether or not the Waterford Greenway should have been used as a guide to forecast the numbers that will be attracted to the facility. The provision of parking was also raised in 91 FI submissions, mainly concerning the removal of parking on Blessington Main Street and whether there would be adequate parking around the lakes for users of the greenway.



- 9.4. Another reason for concern was the lack of proposed toilets to serve the greenway. The primary issue in this regard was the potential for waste from humans, and from dogs, to reach the reservoir. It is considered in numerous submissions that the use of toilets in existing public houses in villages around the lake is unsatisfactory having regard to the fact that there is no mains sewage network. The only toilets proposed to serve the greenway will be at the greenway hub in Blessington. Pollution in the form of run-off from the proposed tarmac surface of the greenway was also a major source of concern, along with the potential for wider environmental impacts on the water environment, habitat and species. The issue of tree felling was brought up within approximately 57 submissions.
- 9.5. Other common issues raised in submissions related to the lack of public consultation; litter and the lack of bins; fencing, trespassing and the potential for dogs attacking livestock and disturbing birds; anti-social behaviour and the management of the greenway; the installation rock armour and its potential for pollution and adverse visual impacts; the lack of public transport serving the area; the requirement for EIA; inadequate surveying (aquatic, noise, bats); and the route choice. In relation to the last point, it was suggested in submissions that there is scope for the greenway to bypass Blessington on its lake side. A number of submissions proposed a shorter route from Blessington to Poulaphouca to Tulfarris and back. Other parties recommended a greenway more like the existing section in terms of surface and width, and the use of existing roads was put forward by other parties.
- 9.6. Matters were raised by a smaller number of parties in relation to privacy, boundaries, disability access, construction phase inconvenience, impact on livestock and agricultural operations, flooding/drainage, culverts and crossings, carbon emissions/ climate change, health and safety, monitoring and evaluation, groundworks, insurance, access to Russborough House, archaeology, impact on views, pest control, accommodation for tourists, the underpass at Knockieran, proposals for the greenway hub, general access to the greenway, and safety and security. A full summary of all third party responses to the further information submission is contained in Appendix 5.

### Valid Further Information Submissions Received

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
1.	Aine Ascough		Objects (endorses C. Ascough)	✓	✓			✓	✓			✓	✓
2.	Aine Burns	YES	Objects*		✓	✓							
3.	Aine Butler		Objects	✓	✓	✓	✓	✓	✓		✓	✓	
4.	Aine Moran	YES	Supports										
5.	A. Giltrap Mills		Objects*	✓	✓		✓						
6.	Alan Cowie		Objects*	✓	✓	✓	✓						
7.	Alan Stanley	YES	Objects	✓	✓	✓					✓	✓	✓
8.	Alana Wilhelm	YES	Supports										
9.	Alison Kieman	YES	Objects*			✓	✓						
10.	Andra Johnston	YES	Supports	✓			✓						
11.	A. & L. Hogan	YES	Objects			✓			✓		✓		
12.	Ann Mooney		Objects	✓	✓	✓	✓	✓				✓	✓
13.	A. Murphy & G. Cruise	YES	Objects		✓	✓	✓						
14.	Ann O'Sullivan		Objects	✓	✓			✓				✓	✓
15.	Anna-May Woods	YES	Supports										
16.	Aoife Brennan		Supports										
17.	Aoife O'Neill Hill	YES	Objects	✓		✓							

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
18.	Assumpta Byrne		Objects	✓		✓	✓				✓		
19.	Audrey McDonald	YES	Objects	✓	✓	✓						✓	
20.	Ballymore Eustace Community Development Association	YES	Supports										
21.	Barry Dalby	YES	Objects			✓					✓		
22.	Barry Kinane		Objects		✓				✓		✓	✓	
23.	Bernadette Hennessy		Objects	✓	✓	✓							
24.	Bernadette Kavanagh	YES	Objects	✓				✓	✓		✓		
25.	Bernadette Moran		Objects	✓	✓	✓	✓						
26.	Bernie Kavanagh	YES	Objects	✓	✓			✓		✓		✓	✓
27.	Blessington and District Forum		Objects*	✓	✓				✓		✓		✓
28.	Blessington Family Practice	YES	Objects			✓	✓						
29.	Bradley Foster	YES	Objects	✓	✓	✓	✓		✓	✓	✓		
30.	Brendan Hughes		Objects	✓	✓					✓			

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul -tation	Tul-farris	Traffic	Enviro-nment	Trees
31.	Brian Hennessy	YES	Objects									✓	
32.	Brian Kingham	YES	Objects	✓	✓			✓	✓		✓	✓	✓
33.	Brian Miley		Objects	✓	✓				✓	✓	✓		
34.	Brian Murphy	YES	Supports										
35.	Brian O'Meara	YES	Supports										
36.	Cara Hennessy	YES	Objects	✓	✓	✓	✓	✓					
37.	Carmel A Larkin	YES	Objects	✓			✓						
38.	Carmel Ascough		Objects	✓	✓			✓	✓			✓	✓
39.	Carol Feely	YES	Objects				✓						
40.	C. & M. Kehoe		Objects*	✓	✓	✓			✓		✓		
41.	Catherine Miley	YES		✓							✓	✓	✓
42.	Catherine O'Toole		Objects	✓	✓		✓	✓			✓		✓
43.	Catherine Roche		Objects	✓									
44.	Catriona Byrne		Objects			✓	✓				✓		
45.	Christine Kinsella	YES	Objects	✓	✓	✓		✓	✓			✓	✓
46.	Christopher Foster	YES	Objects	✓	✓	✓	✓			✓	✓	✓	✓
47.	Ciara Stewart		Objects	✓	✓	✓		✓	✓	✓			✓
48.	Claire Carter	YES	Objects	✓	✓	✓	✓			✓	✓	✓	✓
49.	Cllr Gerry O'Neill	YES	Objects	✓	✓	✓			✓	✓			
50.	Cllr. E. Timmins		Objects	✓	✓	✓	✓	✓	✓	✓			

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
51.	Dave Ryall		Objects	✓	✓	✓							
52.	D. & E. O'Reilly	YES	Objects	✓	✓	✓	✓	✓	✓		✓		✓
53.	David Gribben	YES	Objects	✓	✓								
54.	Deirdre Carroll	YES	Objects				✓				✓		
55.	Development Applications Unit		SEE SUBMISSION										
56.	Diana Gallagher		Supports	✓	✓	✓							
57.	Dr. Andrina O'Brien	YES	Objects	✓		✓	✓						
58.	Dr. Niall Collins	YES	Objects				✓						
59.	Dublin City Council Water Service		SEE SUBMISSION										
60.	Edel McKeon	YES	Supports										
61.	Edward Miley		Objects						✓	✓			
62.	Eimear Behan	YES	Objects	✓	✓	✓			✓			✓	
63.	Elizabeth Miley		Objects		✓				✓	✓			
64.	Emma Keogh	YES	Objects			✓	✓						
65.	Eugene Headon	YES	Objects	✓									
66.	Evelyn Pender		Objects	✓	✓	✓			✓			✓	✓
67.	Fiona Ryan	YES	Supports										
68.	Garrett Headon	YES	Objects	✓									

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
69.	Gary Stewart		Objects							✓			
70.	Glen Cullen	YES	Objects	✓	✓	✓	✓			✓	✓		
71.	Glenn Querl	YES	Supports										
72.	Graham Coe	YES	Supports										
73.	Harry Farrington		Objects*		✓	✓			✓				✓
74.	H. Murphy & S. Walsh	YES	Objects	✓	✓	✓	✓						
75.	Helena Carstairs	YES	Objects		✓		✓		✓				
76.	Hilary Sherlock		Objects	✓	✓	✓	✓						✓
77.	Irene Farrell	YES	Objects		✓	✓	✓						
78.	Jacqueline Tyrrell (2 Rockypool Villas)	YES	Objects	✓		✓					✓		
79.	Jacqueline Tyrrell (Watergrass House)		Objects	✓		✓			✓		✓		
80.	James McDonnell		Objects	✓		✓	✓	✓					✓
81.	James Mooney	YES	Supports										
82.	J. & J. Stanley	YES	Objects		✓			✓				✓	✓
83.	Jane Nolan	YES	Supports										
84.	Jenise O'Brien		Objects		✓	✓					✓		✓

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-ment	Trees
85.	Jennifer Dunne		Objects	✓		✓	✓	✓		✓			✓
86.	Jenny Cullen	YES	Objects	✓	✓	✓	✓	✓		✓	✓		✓
87.	Jim Haide	YES	Supports										
88.	Joanna Barry	YES	Supports										
89.	Joanne Butler		Objects*	✓	✓	✓	✓	✓	✓		✓	✓	
90.	Joe Morrissey	YES	Objects	✓	✓			✓	✓	✓		✓	
91.	J. Kelly & K. Osborne		Objects*	✓	✓	✓	✓						✓
92.	John Crimin		Objects			✓	✓						
93.	John Fitzsimons		Objects	✓		✓					✓		
94.	John McEvoy	YES	Objects	✓	✓							✓	
95.	John O'Dwyer	YES	Objects*	✓		✓	✓						
96.	John Price		Objects	✓	✓			✓	✓	✓	✓	✓	✓
97.	John Stones		Objects	✓	✓			✓	✓	✓			✓
98.	Jonathan Riche	YES		✓	✓		✓						
99.	Karen Price		Objects	✓	✓		✓		✓			✓	
100.	Kathleen Clarke		Objects	✓	✓								
101.	Kathleen Halligan		Objects	✓	✓				✓		✓	✓	✓
102.	Kathleen Leonard		Objects*	✓	✓	✓	✓				✓	✓	✓
103.	Kathleen Whyte	YES	Objects	✓	✓	✓		✓				✓	

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
104.	Keira Eva Mooney	YES	Supports										
105.	Kevin Crowe	YES	Objects										✓
106.	Kevin Foster	YES	Objects	✓	✓	✓	✓	✓		✓	✓		✓
107.	Kildare West Wicklow IFA	YES	Objects	✓	✓	✓			✓	✓	✓	✓	
108.	Lacken National School	YES	Objects			✓					✓		
109.	Larry Cullen	YES	Objects	✓	✓	✓	✓	✓		✓	✓	✓	✓
110.	Laura Cullen	YES	Objects	✓	✓						✓	✓	
111.	Laura Kavanagh	YES	Objects				✓				✓		
112.	Laura McGillicuddy	YES	Objects										
113.	Laura Power	YES	Object*						✓				
114.	Laura Querl	YES	Supports										
115.	Leo O'Connor, The Star Inn	YES	Objects	✓	✓					✓			
116.	Liam Mooney	YES	Supports										
117.	Liam O'Brien		Supports										
118.	Linda Cullen		Objects	✓	✓	✓	✓		✓	✓	✓	✓	✓
119.	Linda Duncan	YES	Objects	✓	✓	✓	✓	✓	✓		✓		✓
120.	Lisa Donovan	YES	Objects	✓			✓						✓



	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
121.	Louise Hanbidge	YES	Objects*	✓	✓		✓						
122.	Luke Timmins	YES	Supports										
123.	Malwina Hanlon		Objects	✓	✓		✓	✓	✓		✓		✓
124.	M. Miley Gallagher	YES	Objects	✓	✓		✓						
125.	Margaret Schofield	YES	Objects		✓			✓	✓		✓	✓	
126.	M. & D. Tyrrell	YES	Objects			✓			✓		✓		
127.	Margaret Whelan	YES	Supports										
128.	Maria O'Hara	YES	Supports										
129.	Maria Walsh		Objects		✓				✓	✓			
130.	Mark Wright		Objects	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
131.	Martha Brennan	YES	Objects*	✓	✓	✓		✓					
132.	Martin Hennessy		Objects	✓	✓	✓			✓				
133.	Martina Sammon	YES	Objects*	✓	✓	✓	✓						✓
134.	Mary Ball	YES	Objects	✓		✓			✓		✓		
135.	Mary Cullen	YES	Objects	✓			✓						
136.	Mary Steeds	YES	Supports										
137.	Maura Byrne		Objects	✓	✓			✓				✓	✓
138.	Maura Fitzpatrick	YES	Objects	✓		✓			✓		✓		
139.	Maura Hughes		Objects*	✓	✓					✓			
140.	Michael Schofield		Objects	✓	✓			✓	✓		✓	✓	

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
141.	Michael Bailey		Objects	✓									
142.	Michelle Mooney	YES	Supports										
143.	M. & S. Phibbs		Objects	✓									
144.	M. & K. Byrne	YES	Objects	✓	✓	✓		✓	✓			✓	✓
145.	Niall Geoghegan	YES	Objects	✓	✓	✓							
146.	Niamh Ryan	YES	Objects*	✓	✓	✓							
147.	Nicola Farrington		Objects	✓	✓	✓			✓				✓
148.	Noel Kennedy	YES	Objects	✓	✓		✓	✓		✓			✓
149.	Noelle Kavanagh	YES	Objects	✓	✓	✓	✓		✓				
150.	Oliver Stones		Objects		✓			✓	✓	✓			✓
151.	Olivia Ryall	YES	Objects			✓	✓						
152.	Olwyn Sheehan	YES	Supports										
153.	P. & C. Chambers		Objects	✓	✓	✓		✓		✓	✓		
154.	Pat Quinn		Objects										
155.	P. & O. Nolan		Objects			✓							
156.	Patsy Glennon Cllr.		Objects	✓	✓	✓							
157.	Paul Miley		Objects						✓	✓			
158.	P. & B. O'Sullivan		Objects	✓	✓	✓							
159.	Rachel Murphy		Objects	✓	✓		✓						
160.	R. O'Sullivan		Objects	✓	✓			✓	✓			✓	✓

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul -tation	Tul-farris	Traffic	Enviro-nment	Trees
161.	R. & L. Willoughby		Objects	✓	✓	✓	✓			✓	✓		
162.	Roisin Ellis	YES	Objects				✓						
163.	Ronan O'Dwyer	YES	Supports										
164.	Rose Kennedy	YES	Objects	✓	✓		✓	✓		✓			✓
165.	Ross Butler		Objects*	✓		✓	✓				✓		
166.	Roy Sherlock	YES	Objects		✓	✓		✓					✓
167.	S.A. & W. Ryall		Objects	✓	✓		✓	✓	✓		✓	✓	✓
168.	Sam Wynn	YES	Objects*		✓	✓		✓				✓	✓
169.	Seamus Doyle	YES	Objects	✓		✓		✓		✓		✓	✓
170.	Seamus Kelly	YES	Supports										
171.	Seamus McDonnell		Objects	✓			✓						
172.	Sean Ascough		Objects	✓	✓	✓			✓		✓	✓	
173.	Sean Farrington		Objects*	✓	✓	✓	✓			✓			✓
174.	Sean Twomey	YES	Supports										
175.	Sharon Geoghegan	YES	Objects	✓	✓	✓							
176.	Sheila Kinane		Objects	✓	✓	✓							
177.	Sinead Carroll	YES	Objects				✓						
178.	Sinéad McDonald	YES	Objects	✓	✓	✓	✓	✓				✓	✓
179.	S. Donnelly TD		Objects	✓	✓	✓							
180.	Steve Doran		Supports										

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul-tation	Tul-farris	Traffic	Enviro-nment	Trees
181.	Steven Pettigrew	YES	Supports										
182.	Susan Rossiter		Objects*	✓	✓	✓			✓			✓	
183.	Tara Kelly	YES	Objects	✓		✓		✓			✓	✓	
184.	The Valkeymount Peninsula Wildlife Project		Objects		✓			✓	✓		✓	✓	
185.	Thomas Butler		Objects	✓	✓	✓	✓	✓	✓		✓	✓	
186.	Thomas Kelly (Ballintober)	YES	Objects	✓	✓	✓	✓	✓	✓	✓		✓	✓
187.	Tom Ascough	YES	Objects	✓	✓			✓	✓			✓	✓
188.	Tom Mooney		Objects*	✓	✓	✓			✓			✓	✓
189.	Tony Crowe	YES	Objects									✓	
190.	T. & A. Kavanagh		Objects	✓	✓				✓	✓		✓	✓
191.	Turlough Kinane		Supports	✓	✓		✓	✓	✓			✓	
192.	Uisce Eireann		SEE SUBMISSION										
193.	Valerie Hanlon		Objects	✓	✓		✓	✓	✓		✓	✓	✓

	Observer	New observer?	Objects/ Supports	Traffic Lights	Toilets	Parking	Main Street	Run off	Consul -tation	Tul-farris	Traffic	Enviro-nment	Trees
194.	Valleymount and Ballyknockan Forum		Objects	✓	✓			✓	✓	✓	✓	✓	✓
195.	Veronica Reid	YES	Objects	✓		✓	✓		✓		✓		
196.	V. Doyle & S. Hayes		Objects	✓	✓			✓	✓		✓	✓	
197.	W. & M. Miley		Objects*	✓					✓	✓			
198.	Yvonne Foster	YES	Objects	✓	✓	✓	✓			✓	✓		✓
199.	Yvonne Kelly	YES	Supports										
<b>TOTALS (approximates)</b>		<b>114 (yes)</b>	<b>34 mainly in support</b>	<b>124</b>	<b>111</b>	<b>91</b>	<b>70</b>	<b>52</b>	<b>63</b>	<b>39</b>	<b>57</b>	<b>54</b>	<b>57</b>

## 10.0 Assessment

### 10.1. The likely consequences for the proper planning and sustainable development of the area:

- 10.1.1. The proposed Blessington eGreenway will involve the development of a predominately tarmac walking and cycling path (3m widening to 4m at trailheads) around Blessington Lakes/ Poulaphouca Reservoir, Co. Wicklow. The proposal will upgrade an existing 5km length of greenway between Blessington and Russborough House, and a new 25km greenway section is proposed, mainly through ESB lands around the lakeshore. The remainder of the route will comprise of an urban cycling scheme/ traffic calming. This includes the section through Blessington town. There are three existing bridges that will be reconfigured from two-way to a single lane carriageway shuttle system controlled by traffic lights to allow a lane to be allocated to shared cycle and pedestrian paths. There will be eight road crossings along the route and culverts/ bridges will be constructed at river crossings. This includes a new greenway bridge at Annacarney. Other structural elements include rock armouring, extensions/ upgrading of car parks, and construction of an underpass at Knockieran. The proposal will also involve the felling of 7,265 trees to facilitate the greenway.

#### *National Level*

- 10.1.2. The **Climate Action Plan (CAP24)** sets out a roadmap to halve emissions by 2030 and reach net zero by no later than 2050. The Avoid-Shift-Improve Framework is outlined to achieve a net zero decarbonisation pathway for the transport sector, whereby actions are prioritised to *avoid* the need to travel; *shift* to more environmentally friendly modes; and to *improve* the energy efficiency of vehicle technology. Road space reallocation and a sustainable approach to parking policy are considered to form key measures to both reduce unsustainable private car demand and enhance placemaking, supporting improvements in the accessibility and air quality of our urban spaces.

- 10.1.3. From a transport perspective, the proposed greenway will generate some potential for modal shift to active travel and road space reallocation. As noted above, the greenway will provide a safe and sustainable alternative means of transport for residents around the lake to access surrounding services and facilities, particularly within Blessington. This includes public transport serving the town. The proposal will also see road space reallocation through removal of some parking in Blessington town centre and the one-way systems on bridges to facilitate the greenway.
- 10.1.4. CAP24 refers to the National Cycle Network, which sets out the inter-urban cycling network (approximately 3,500km) around the country linking urban centres, including many existing and planned greenway routes. The network map shows Blessington linked with Naas/ Sallins and the proposed Blessington Greenway is outlined. As recognised by the Department of Transport, and referred to in CAP24, the proposed greenway will support a wide range of benefits including the positive economic impact on local businesses, enabling increased physical activity that will benefit the health and wellbeing of users, and supporting safe journeys to and from home, work, education and shops.
- 10.1.5. Notwithstanding the above benefits, there is a consistent message throughout CAP24 of emissions reduction, and two ways that this can be achieved are through reduced car journeys and afforestation. The degree to which the proposed development encourages car journeys, and the extent of tree removal will impact on emissions. The climate impact of the proposed development is assessed in further detail in Section 10.2.6.
- 10.1.6. **The National Planning Framework** outlines a set of goals expressed as ten National Strategic Outcomes to deliver shared benefits for communities across the country. Of relevance to the proposed Blessington eGreenway project are the National Strategic Outcomes relating to strengthened rural economies and communities; sustainable mobility; enhanced amenities and heritage; sustainable management of water, waste and other environmental resources; and transition to a low carbon and climate resilient society.

- 10.1.7. The greenway will bring about associated benefits that will help to strengthen the rural economy by supporting existing business and encouraging new start-up enterprises. The anticipated increase in visitor numbers to the local area will require the necessary support services and this will provide local employment within the tourism industry and opportunities for locals themselves to benefit from a wider selection of businesses and services.
- 10.1.8. It is recognised in the NPF that enhanced amenities and heritage will require investment in well-designed public realm, which includes public spaces, parks and streets, as well as recreational infrastructure. The proposed greenway will be a regionally important amenity and that will serve visitors and locals alike, resulting in a greater appreciation of the heritage value of the area. Heritage value is better appreciated through better public spaces.
- 10.1.9. The National Strategic Outcome “Sustainable Mobility” acknowledges the need to move away from combustion engine driven transport systems. The proposed amenity offers the potential to transition to more sustainable modes of travel through the development of safe cycle and walking routes. Modal shift for the purposes of local trips around the lake will be limited to the new connections between the villages, Blessington and surrounding amenities. The net effect of sustainable mobility may contribute towards another goal of the National Planning Framework, which is lower carbon and climate resilience. However, as noted above, this should be measured in the context of car trips generated by the proposed development. The potential of the proposed greenway to impact on the sustainable management of water, waste and other environmental resources is a matter that also needs to be assessed further.
- 10.1.10. Having regard to the above, I would be of the opinion that that proposed greenway will help to deliver National Policy Objective 22, which seeks to *“facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level”* and National Policy Objective 27, which aims to *“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.”* However, doubt remains as to the net effect of the proposed development on greenhouse gas emissions. In addition, there is uncertainty on the local environmental cost of proposed greenway. These matters are addressed in more detail in the following sections.

10.1.11. **Ireland’s 4<sup>th</sup> National Biodiversity Action Plan 2023-2030** sets out five objectives for a national approach to biodiversity to adopt a whole of Government, whole of society approach to biodiversity; to meet urgent conservation and restoration needs; to secure nature’s contribution to people; to enhance the evidence base for action on biodiversity; and to strengthen Ireland’s contribution to international biodiversity initiatives. It is an action of the plan that all Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure.

10.1.12. In response to the submission from the Development Applications Unit of the Department of Housing, Local Government and Heritage, the applicant was invited to provide an estimation of the amount and spatial extent of individual habitats that will be lost to the proposed development to assess whether the proposed mitigation and compensatory measures are adequately detailed to be successful and are appropriate to ensure that there is ‘no net loss’ of biodiversity (National Biodiversity Action Plan, 2017-2021). This is addressed under the Biodiversity section of the assessment.

#### *Regional Policy*

10.1.13. The **Eastern & Midlands Regional Spatial & Economic Strategy** (RSES) provides an investment framework and climate action strategy to support the implementation of Project Ireland 2040 (National Planning Framework and National Development Plan) at a regional level. It is recognised in the RSES that there are significant opportunities to develop a number of flagship greenways in the Region, including the Blessington Greenway, which offers the potential to attract people to work and visit

the area and surrounding villages. The RSES also promotes a shift in emphasis from providing road infrastructure to a more integrated approach whereby street environments are designed as places that allow for priority and permeability for active and sustainable transport modes. This aim would be reflected in the proposals for the greenway as it passes through Blessington town.

- 10.1.14. The RSES sets out 16 Regional Strategic Outcomes (RSO) aligned to the three key principles of healthy placemaking, economic opportunity and climate action . Of most relevance to supporting the proposed development is RPO 7.24, which seeks to *“promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high-capacity flagship routes that can be extended and /or linked with local greenways and other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable.”* The proposed development would also be consistent with other RSO’s that support enhanced access to state and semi-state lands for recreation and tourism purposes (RPO 6.17), and the promotion of the Strategy for the Future Development of National and Regional Greenways (RPO 7.25). However, care is necessary to support the attainment of high ecological status for waterbodies (RPO 7.26) and the conservation of European sites, other nature conservation sites, ecological networks, and protected species, (RPO 7.22).

#### *County Wide Policy*

- 10.1.15. It is recognised in the **Wicklow County Development Plan, 2022-2028** that greenways are significant tourism assets that create opportunities to improve the health and wellbeing of the local population , boost the appeal of a place, add value to the tourism offering and facilitate year-round tourism activities. The proposed greenway, incorporating the villages of Ballyknockan, Valkeymount and Lackan , is regarded as an important piece of tourism infrastructure that will provide economic and social benefits to the County.
- 10.1.16. There are a number of policies and objectives in the Development Plan that provide for the development of the greenway. Policies CPO 11.30 and CPO 11.31 seek to promote the development of Blessington as a tourist hub, particularly with respect to

the provision of accommodation and service bases for outdoor recreation activities. CPO 11.35 supports the development of a strategic national network of walking, cycling, horse riding and water-based trails. CPO 11.36 seeks to facilitate the delivery of Blessington Greenway including ancillary facilities such as signposting and car parks. Tourism infrastructure, services and accommodation for the Blessington Greenway are promoted under CPO 11.37. There are also policies set out to improve public transport access to Blessington (CPO 12.21) and to improve pedestrian and cycling infrastructure on Blessington Main Street upon completion of the Blessington Inner Relief Road.

10.1.17. The Development Plan is nonetheless cognisant of the potential impacts of the development of infrastructure such as the proposed greenway. Policy CPO 11.50 highlights that any increase in visitor numbers and/or any change in visitor behaviour needs to be managed in order to avoid significant environmental effects, including loss of habitat and disturbance. The potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport/ traffic) resulting from tourism proposals should also be considered (CPO 11.51). The delivery of new / improved wastewater treatment plants in Blessington and the lake areas around Blessington are supported under CPO 13.15. Policy CPO 17.20 discourages development that requires the felling of mature trees of environmental and/or amenity value. Projects giving rise to adverse effects on the integrity of European sites shall not be permitted except as provided for in Article 6(4) of the Habitats Directive (CPO 17.5).

10.1.18. On the one hand, there are numerous policies and objectives set out in the Development Plan that directly support the delivery of Blessington Greenway. However, on the other hand, it is suggested that the greenway may be premature pending the achievement of other Development Plan policies. For example, new and improved wastewater treatment plants, the completion of the inner relief road and improvements in public transport access to Blessington. These policies would ensure that public toilets could be provided around the greenway; works to pedestrian/ cycle

infrastructure could be carried out on Main Street; and access to the greenway by private car from the metropolitan area could be reduced.

- 10.1.19. In terms of overall compliance with the proper planning and sustainable development of the area, I would be satisfied that that the proposed development is acceptable in principle. Clearly there is strong policy backing for the proposed greenway but with the caveat that the environment must be protected. I would therefore conclude that the consequences for the proper planning and sustainable development the area cannot be fully determined without assessing the likely effects on the environment and the likely significant effects on European sites.

#### *Consultations*

- 10.1.20. A number of submissions on the proposed scheme contend that the consultation process has been inadequate for a project of this complexity and that further consultation is warranted along with the holding of an oral hearing.
- 10.1.21. Following my recommendation, the Board decided that the holding of an oral hearing was not required in this case. It was decided that there is sufficient written evidence on file to enable an assessment of issues raised. It should be noted that the holding of hearings is a discretionary function of the Board.
- 10.1.22. Non-statutory consultation was held at the early stages of the proposed development and a number of consultation tools were used, including online and in-person meetings conducted with local communities, formal council meetings, establishment of a greenway project board, regular updates in Wicklow County Council's newsletter, landowner engagement, appointment of a project liaison officer, initial meeting of the communications working group, setting up of a dedicated website, and expansion of social media reach for the proposed greenway.
- 10.1.23. The statutory process has made available for public review all application information as set out in legislation, as well as allowing for submissions in relation to the proposals to the Board. Site notices were erected and newspaper notices published. Overall, I am satisfied that extensive public consultation and stakeholder engagement was undertaken. The applicant has clearly engaged with all third

parties, residents, businesses, community groups and other organisations and has responded to concerns raised. I am also satisfied with the level of clarity provided within application and statutory consultation documentation and consider that the applicant has complied with the requirements of the Aarhus Convention in its relevance to the statutory process and note that such requirements are not relative to any non-statutory consultation which is carried out at the discretion of the applicant.

## **10.2. The likely effects on the environment:**

10.2.1. Having regard to the nature and scale of the proposed development, I consider that the main environmental effects to be assessed, other than those covered under the Appropriate Assessment, are as follows:

- EIA Screening
- Traffic and Transport
- Population and Human Health
- Biodiversity
- Air quality and Climate
- Noise
- Land and Soils
- Water
- Landscape & Visual
- Cultural Heritage
- Alternatives

### **10.2.2. EIA Screening**

10.2.2.1. The proposed development described as a greenway consisting of approximately 33km of walking and cycling paths is not of a development type for the purposes of

Part 10 listed in Schedule 5 of the Planning and Development Regulations, 2001 (as amended). Furthermore, the proposal does not fall under any mandatory or prescribed type of road development pursuant to Section 50 Roads Act, 1993 (as amended) that requires the preparation of an Environmental Impact Assessment Report.

- 10.2.2.2. Section 2.3.3 of the “Environmental Impact of National Road Schemes – Practical Guide” (National Roads Authority, 2008) in relation to the Consideration of Environmentally Sensitive Sites states that if a proposed sub-threshold road scheme would be located on an environmentally sensitive site, the road authority shall decide whether it would or would not be likely to have significant environmental impacts. In this regard, it is stated that in cases *“where the road authority concludes that significant environmental impacts are likely, it informs An Bord Pleanála, and, where the Board concurs, it issues a direction to the road authority to prepare an EIS. It is important to note that where the road authority considers that significant environmental effects are not likely, there is no requirement to inform the Board. However, in such circumstances, the grounds for the road authority’s conclusion should be recorded.”*
- 10.2.2.3. An EIA Screening assessment has been prepared on behalf of the Wicklow County Council to determine whether an EIAR is warranted for the proposed project. This document determined that a sub-threshold assessment was required and investigates whether the project has significant negative impacts on the environment having regard to its characteristics, location and type and characteristics of the potential impact. It is considered within the screening conclusion of the report that no EIAR is required for the proposed project.
- 10.2.2.4. Wicklow County Council has therefore been advised that significant environmental effects are not likely, notwithstanding the fact that Appropriate Assessment Screening concluded that an NIS was necessary. I am therefore in agreement that it is not necessary to inform the Board and Wicklow County Council’s conclusion is recorded within the EIAR Screening Determination of December 2021.

10.2.2.5. A number of objectors consider that the Board is required to direct the preparation of an EIAR pursuant to Section 50 (1)(d) of the Roads Act, 1993. The application before me is submitted under Section 177AE of the Planning and Development Act, 2000 (as amended). If an objector requires a formal view as to whether EIA is required, there are other statutory mechanisms for them to do so.

10.2.2.6. Notwithstanding this, it is now a requirement to specifically examine, and where appropriate, screen the development for EIA. EIAR Screening is carried out within Form 3 in Appendix 6 of this report. It is concluded that notwithstanding the features and measures proposed by the applicant to avoid or prevent significant effects on the environment, there is some uncertainty as to whether the proposed development would be likely to have significant effects on the water environment. However, with the application of full and proper mitigation measures, it is considered that the proposed development would not be likely to have significant effects on the wider environment, including the water environment, and that the preparation and submission of an Environmental Impact Assessment Report would not, therefore, be required.

### 10.2.3. **Traffic & Transport**

10.2.3.1. As noted in Sections 7.8 and 10 above, the traffic and transport impacts of the proposed greenway attracted the greatest amount of third party submissions. The main issues raised and addressed hereunder are the proposed traffic light shuttle system on bridges, traffic surveying and assumptions, traffic congestion and parking, sustainable transport access, the impact on Blessington town centre, the Tulfarris link, and disability access.

10.2.3.2. The single issue that attracted most objection was the proposed **traffic light shuttle system** for the bridges at Knockieran, Valleymount and Baltyboys. At present, these bridges accommodate 2-way traffic and there is a footpath behind a barrier at one side. Blessington Bridge at Knockieran has a span of approximately 200m and Baltyboys Bridge is slightly shorter at around 185m. Valleymount Bridge is slightly

shorter again at about 180m. It is proposed to introduce a one-way shuttle arrangement for general traffic controlled by traffic lights at either end of the bridges.

- 10.2.3.3. The main reasons for objection were the potential for traffic delay at the proposed lights, including emergency vehicles; the width of the bridges, particularly for agricultural vehicles; the condition of the bridges; and bridge measurements. In response to the further information request issued by the Board, approximately 124 submissions mentioned the proposal for traffic lights and one-way systems at the bridges although this was not raised within the further information request. Many of the objectors in the first round of consultation were in favour of the greenway but were specifically against the use of the bridges for one-way general traffic. It was stated in a small number of submissions that the traffic lights at the bridges are a small price to pay for the proposed greenway.
- 10.2.3.4. In response to the issue of the proposed one-way arrangements for general traffic at the bridge, the applicant refers to the National Investment Framework for Transport in Ireland (NIFTI) which encourages the use of active travel and public transport ahead of private transport, together with the maintenance/ optimisation of existing assets ahead of outright new infrastructure. I would support this view that the proposal for existing bridges is consistent with NIFTI and also with the aims set out in CAP24 for emissions reduction, which includes road space reallocation. There are many current proposals in an urban setting where road space is being reallocated for active travel and where there are a lot more competing users for such road space.
- 10.2.3.5. Additional survey counts were undertaken in July 2022 and May 2023. The May 2023 surveys were conducted at 13 locations around the lake and included Junction Turning Count (JTC) surveys over 12-hour periods and Automatic Traffic Counts (ATC) surveys over a week. A comparison exercise was carried out of 2-way traffic flows at each of the bridges. As submitted by the applicant, the data presented in the original report is still valid and relevant. The total 2-way traffic flow at the three bridges was 497, 398 and 450 for 2021, 2022 and 2023 respectively.



- 10.2.3.6. In terms of traffic impact assessment, it should be highlighted that there are low levels of traffic associated with the road network around the reservoir. Specific modelling was undertaken of the proposed shuttle systems at the bridge crossings. The maximum cycle time at the traffic lights is 80 seconds at the Vallemount Bridge. There is a 71 second cycle time at Blessington Bridge and 78 seconds at Baltyboys Bridge. The maximum total delay at any of the bridges occurs at Baltyboys Bridge during weekend peak, which is 4.25 PCU/ Hr. The model results show that the proposed shuttle system has no capacity issues at any location.
- 10.2.3.7. Notwithstanding the level of objection to the proposed shuttle system at the bridge, I do not consider that it is reasonable grounds for refusing permission for the proposed greenway. The five main requirements and design principles for cycle-friendly infrastructure, as set out in the Cycle Design Manual, are safety, coherence, directness, comfort and attractiveness. People of all ages should therefore be accommodated, and safety is of paramount importance. Cantilevered boardwalks to the side of the bridge are likely to be the best safety solution; however, there are no proposals at this stage for such an arrangement. In my opinion, the proposal for a one-way shuttle system for general traffic is the best solution for moving people across the bridges in a safe manner. There will be adequate segregation for pedestrians and cyclists and the level of delay experienced by motorists will not be significant. Road space reallocation is government policy as expressed in CAP24 and I consider the quantum of such road space reallocation at the bridges and in Blessington town centre to be minimal in the context of a 33km greenway.
- 10.2.3.8. There may be occasions where emergency or oversized vehicles will be required to use the bridges. As noted by the applicant, larger vehicles will be able to cross with the support of traffic management procedures, and priority is always afforded to emergency vehicles at traffic lights.
- 10.2.3.9. As noted above, **traffic surveying** was carried out for proposed greenway in 2021, and again in July 2022 and May 2023 in response to the further information request. There was concern by objectors that the original surveys in 2021 were carried out when Covid 19 restrictions were in place. The Board requested updated traffic

surveys from the applicant to fully reflect the movement patterns around the route of the proposed greenway.

10.2.3.10. In response, the applicant carried out additional surveys and assessed vehicle trip generation, trip distribution and network assignment, before quantifying the potential level of impact generated by the proposed development on key junctions of the surrounding road network. The operational performance and level of impact on the key junctions was then assessed.

10.2.3.11. A business plan for the proposed greenway was carried out in 2018 and it was projected that there is potential to attract 300,000 visitors annually. Figures for Waterford Greenway, which attracts over 250,000 visitors annually, were reviewed for comparison purposes. It was considered unrealistic within some submissions to compare Waterford Greenway to the proposed Blessington Greenway having regard to the difference in size of catchment populations. There may be some merit in this reason for objection; however, a greenway only has a certain capacity, and users will tend to avoid busy periods, when the most adverse impacts might occur. Over time, the number of users is likely to stabilise. I also note that as other greenways are constructed, overall user numbers are likely to become more evenly spread. For example, greenways near to, or within the Greater Dublin Area are at a more advanced stage at the River Dodder, Broadmeadow and Carlingford Lough.

10.2.3.12. There were also concerns in submissions about the peak hours of greenway usage and how it would interfere with peak commuting times. For the purposes of operational stage assessment, the weekday peak is 17:00-18:00 hours, and the weekend peak is 13:15-14:15 hours. I consider this to be reasonable given that the main usage of the greenway will be for leisure purposes. The Waterford Greenway usage figures were used to determine access by car compared to other modes, as well as the average party size. I consider these assumptions to be acceptable as the usage profile for greenways is likely to be similar given their largely recreational character. The Blessington Greenway would also have some potential for replacing local car journeys with active travel trips.

- 10.2.3.13. For the purposes of traffic impact assessment and determining the potential for **traffic congestion and parking requirements** for the proposed development, it has been determined that peak weekday daily arrivals are 598 vehicles, and the peak weekend daily arrivals are to be 765 vehicles. It is also assumed that all vehicles would arrive within a 4-hour window during the peak weekday period and peak weekend period, with the average maximum stay for a user being 2 hours. This enables the traffic impact assessment to examine a worst-case scenario.
- 10.2.3.14. Traffic growth rates are applied to the design years of 2031 and 2041 and the proposed development is assessed at opening year (2026). The traffic impact of all 13 junctions around the greenway route would be greater than 10% increase in development flows above the base flow at the junction in question. However, the road network around the reservoir has low levels of traffic and therefore Junctions 2 to 9 were excluded from detailed traffic modelling. The TRL Junctions 10 software was used to assess whether any of the remaining junctions would operate at a Ratio to Flow Capacity (RFC) of greater than 85%, whereby traffic congestion would begin to occur. None of the junctions recorded an RFC in excess of 0.85 at weekday or weekend peak. Furthermore, the maximum queue length recorded was 2.6 passenger car units (PCUs).
- 10.2.3.15. In terms of car parking, there is an existing provision of 401 spaces within 10 car parks around the lake. It is proposed to extend both the Russellstown car park and Knockieran car parks by 50 spaces each. Six bus parking spaces are also proposed at Knockieran. Of the total of 501 spaces, 85 of these will be EV spaces. As noted above, peak arrivals of 765 vehicles have been identified. It is assumed that all vehicles arrive in a 4-hour window and the average maximum stay is two hours. The peak demand for car parking is therefore calculated at 382 vehicles, which can be accommodated within the 501 spaces provided. It is also submitted that a further 200 public car parking spaces will be provided at council lands near the Avon for future planned recreation and amenity purposes.
- 10.2.3.16. Having regard to the above, I consider that the proposed development will not give rise to any significant issue with respect to traffic congestion and parking in the

surrounding area. The potential impacts associated with the proposed development in relation to traffic have been examined and the road network can satisfactorily accommodate the increase in traffic associated with the proposal. I am satisfied that the assumptions with respect to visitor numbers, peak times and modal split are robust, and realistically inform the traffic impact assessment. I consider it prudent that parking should not be overprovided for to a significant degree. It is a balancing act to provide parking to serve a proposed development without encouraging car use. In some respects, a limited number of parking spaces could help to reduce car use.

- 10.2.3.17. Notwithstanding that there appears to be adequate capacity to accommodate the traffic and parking requirements of the proposed development, it is a concern that the majority of users will access the greenway by private car. The Board sought a **sustainable transport** access strategy to include measures to minimise private car use from the applicant as further information. Section 10.2.6 below also looks at the potential of the proposed development to generate increased emissions.
- 10.2.3.18. It is stated in the Traffic and Transport Assessment (December 2023) submitted in response to the further information request that there will be 598 peak weekday arrivals to the greenway by car and 765 peak weekend arrivals. The daily users by bus are 133 for the peak weekday and 170 for the peak weekend. No figure appears to be included for cyclists accessing the greenway without car or public transport use.
- 10.2.3.19. The Sustainable Transport Access Strategy submitted in response to the Board's further information request acknowledges that there is limited availability to public transport in the Blessington area. It is stated that Wicklow County Council will actively promote and support the delivery of national, regional, and local bus services to provide a local link bus service. It is also envisioned that groups will visit the greenway via private coach tours. Locals are expected to walk, cycle or scoot to the greenway.
- 10.2.3.20. Clearly, the proposed greenway will attract a significant volume of trips by private car and the current scope for public transport access is limited. Over time, however, it

can be expected that access to the greenway will become more sustainable. In terms of the CAP24 hierarchical framework, the 'shift' to more environmentally friendly modes can be achieved through improved public transport and longer distance cycling access. It is a policy of the Development Plan to promote the enhancement of public transport services and infrastructure in West Wicklow, including bus linkages to rail stations and park and ride. It is also a policy to promote the Luas extension from City West / Tallaght to Blessington.

- 10.2.3.21. The National Cycle Manual map shows Blessington linked with Naas/ Sallins, a distance of approximately 15km. The distance to the Luas in Saggart is also around 15km. Combined public transport/ cycle trips to the greenway may be hindered by the lack of accommodation for bikes, particularly on buses. Again, this issue should improve over time with increased micro-mobility and the possible emergence of bike hire around the proposed greenway. Shorter distance access to the greenway will also improve over time through implementation of the Blessington Active Travel Scheme and the Blessington Town Centre Masterplan.
- 10.2.3.22. With respect to CAP24 aim to 'improve' the energy efficiency of vehicle technology, it is probable that EV usage will increase over time. The proposed development is being promoted as an 'eGreenway', which will include 85 EV spaces and charging points.
- 10.2.3.23. The proposed development may give rise to other hidden benefits from a sustainable transport viewpoint. The safe, continuous, comfortable and attractive greenway may encourage people, including children to cycle for the first time. Furthermore, the proposal will promote local activity-based tourism, which can replace longer haul tourism.
- 10.2.3.24. The impact of the proposed greenway as it passes through **Blessington town centre**, was another issue that occurred regularly in submissions. The main concerns were the potential for pedestrian and cyclist conflicts, removal of parking and impact on businesses. These concerns related mostly to Main Street but also to Kilbride Road and Rockypool Villas, where the impact of traffic was raised.

- 10.2.3.25. The Board sought further information from the applicant to demonstrate compliance with DMURS where the proposed eGreenway interacts with urban roads and streets with a speed limit of 60 km/h or less. In response, the applicant prepared a technical note on parking arrangements on Blessington Main Street, which outlines safe travel measures including raised tables along quiet routes to slow traffic. Dedicated cycle facilities were not considered practical with the existing carriageway cross-section and would have resulted in large civils works and traffic management to provide the facilities. It is stated that shared use facilities have therefore been designed with the desirable minimum width (3m) through the town centre, reducing to 2.5m (absolute minimum) in pinch point areas.
- 10.2.3.26. Five on-street parking bays will be lost which is not considered to be significant in the context of the total town centre capacity of 75 spaces. It is stated that the town centre will be reviewed as a whole under proposals to develop a streetscape 'Town Centre Regeneration Scheme' in the coming years; this will identify if any additional parking is required. This scheme also aims to deliver streetscape enhancement in accordance with DMURS.
- 10.2.3.27. In my opinion, the proposals for Blessington town centre can be viewed as an interim measure in advance of a wider redesign on town centre surface space. The Council will strive to reclaim and reassert the Main Street as a place for people during the lifetime of the Development Plan and this is reflected in policy CPO 12.44 which seeks *"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 infrastructure on Blessington Main Street and surrounding town centre local road network."*
- 10.2.3.28. I note the proposals to hold consultations to establish if an existing mobility impaired bay, a loading bay and an ambulance bay are still required. The proposal also includes a bay with four parking spaces on Kilbride Road. In general, I would have no objection to the relatively small loss of car parking. As noted above, road space relocation is a stated aim of CAP24 and I would be opinion that car parking should be placed at the bottom of the hierarchy as far as street space allocation is

concerned. Businesses are critical to street life and must be facilitated as best as possible through construction and operational stages. However, businesses can't assume ownership of public space to the front and there is no right to on-street parking. It is also highlighted above that the level of road space reallocation is relatively minor in the context of the wider scheme.

10.2.3.29. The other main reoccurring issue raised in submissions is the proposed section of the greenway to **Tulfarris Hotel**. In its further information request, the Board noted the gradient and road conditions of the Tulfarris section of the proposed eGreenway and stated that consideration shall be given to redefining this section of the eGreenway as a link route.

10.2.3.30. The link from the greenway to Tulfarris Hotel does not form part of the main greenway circuit. The link uses existing local roads which would not be appropriate for greenway use having regard to the gradient and alignment. However, the installation of signage and other appropriate measures to direct people to the greenway could be carried out in any case. The main infrastructural works is a short section of greenway off to the local road and any other greenway works appear to be taking place within the hotel grounds. Similarly, I see no reason to oppose similar accesses and signage towards the greenway from surrounding attractions/amenities. In the event of a grant of planning permission, the Board may wish to set out clearly in conditions that the Tulfarris link section should not be presented as forming part of the greenway.

10.2.3.31. The final issue raised in this section relates to **universal access** which was raised in a number of submissions. For clarification purposes, it should be noted that the Tulfarris section will not form part of the greenway, partly due to excessive gradients. The greenway should otherwise be universally accessible, and a condition in this regard can be attached to any grant of permission.

10.2.3.32. In conclusion to this section, I consider that the proposed greenway is acceptable from a traffic and transport perspective. Two of the main issues raised in submissions relate to road space reallocation at the bridges and car parking removal. These proposals affect a very small amount of road space. I consider that

the traffic surveying effort and the impact assessment provides a robust representation of existing and forecasted conditions on the surrounding road network. It has been demonstrated that the proposed shuttle system at the bridges can work without causing undue delay and that car parking loss is insignificant. I have some concerns with the design of the proposal as it passes through Blessington town centre and the potential for pedestrian/ cycle conflicts. However, the affected streets are not particularly busy for an urban setting, and I note that the proposal appears to minimise disruption pending a more significant redesign of the town centre in the future. I would have reservations that the quantum of car trips generated by the proposed development is contrary to sustainable transport principles. On balance, however, this will be outweighed by the benefits of the proposed scheme, including the promotion of active travel for all ages, and the future potential for improved public transport and electric vehicle access. I consider that conditions should be attached to any grant of permission indicating that the greenway should be universally accessible and that the Tulfarris link shall not form part of the main greenway route.

#### **10.2.4. Population and Human Health**

- 10.2.4.1. The total population for Blessington recorded in the 2022 Census was 5,611. The total population in the nine Small Areas through which the proposed greenway traverses outside of Blessington town is 3,260. The proposed greenway would act as a significant amenity and would improve the health and wellbeing of the local population. There is also the potential for more social interaction and greater appreciation of the natural environment through enhanced access.
- 10.2.4.2. The tourism impacts and associated impact on existing businesses in also highlighted in a number of submissions. The increased numbers of people visiting the area will contribute to the local economy by supporting existing businesses. There is also the likelihood of new business enterprises emerging as a result of the proposed greenway. This will help to provide local jobs and a greater variety of services for the local population and visitors alike. The greenway will be free to use and therefore certain users will not be excluded on the basis of cost.



- 10.2.4.3. Adverse impacts on population and human health will mostly occur during the construction phase of the project. There is potential for air quality, noise and traffic effects, disruption to footpaths, and temporary closure of the existing greenway section. These impacts will be mitigated by measures set out in the CEMP. Adverse operational impacts on population and human health may include traffic delay at the bridges, invasion of privacy, trespassing, litter and anti-social behaviour, lack of dog control, and pollution of the drinking water source. Many of these impacts are assessed in more detail in other sections of this report.
- 10.2.4.4. The Board sought further information from the applicant on matters that affect local population and human health and the behaviour of greenway users. This included details on a code of conduct for the greenway, details on hours of operation, dog control, maintenance and management arrangements, emergency access, and monitoring and evaluation procedures. Proposals were also sought on fencing and boundary treatments. This was an issue of concerns for many objectors for reasons relating to privacy and trespassing, and dogs posing a threat to livestock.
- 10.2.4.5. The applicant addressed these concerns in the further information response by submitting an Outline Management and Maintenance Plan (OM&MP), and a Monitoring and Evaluation Plan (M&EP). The OM&MP sets out details on operational management structure, greenway management duties, financial resources, inspection and maintenance plan and activities, monitoring, complaint management and resolution, code of conduct, control of dogs, water safety, operational hours, severe weather response plan, emergency response plan, and trail accreditation and insurances. The M&EP will involve the collection of user data to assess the demand and where to prioritise investments; aid in the planning and construction of present and future interventions; make the case for new proposals; demonstrate and quantify the economic benefits of the interventions; and communicate the long-term community gains.
- 10.2.4.6. I consider that the above documents provide a comprehensive structure for the safe operation of the greenway. The applicant has given careful thought to the impact of the proposed greenway on the local population and the above measures will help to

ensure that the greenway is well managed, enjoyable for users, and protective of the local population.

- 10.2.4.7. The applicant confirms that most fencing will remain unaltered, and landowner engagement will involve a case-by-case review of boundaries to understand each individual stakeholder requirements and with reference to the existing provision. The applicant's primary goal is to prevent trespassing and to create a secure environment for all stakeholders. Boundary treatments will adhere to the "Code of Best Practice for National and Regional Greenways" and the applicant will draw upon fencing types already established by TII. It is stated in this document that, where necessary, fences shall be provided to assist in preventing trespass and for the protection of members of the public and animals. Fencing will be stock proof and will have regard to farming activity. The applicant will erect appropriate signage at all trailheads to remind greenway users of their responsibilities regarding the control of dogs. The impact of dogs is also addressed in other sections below.
- 10.2.4.8. Overall, I consider that there will be no significant adverse impacts of population and human health during the construction or operational phases of the proposed development. I am satisfied that the impacts identified would be avoided, managed or mitigated by measures forming part of the proposed development, proposed mitigation measures and measures within suitable conditions, and that no significant direct, indirect or cumulative adverse effects on population and human health are likely to arise. The longer-term benefits of the proposed development on population and human health will substantially outweigh any adverse impacts which are likely to occur in the short term.

#### 10.2.5. **Biodiversity**

- 10.2.5.1. The planning application is accompanied by an Ecological Impact Assessment and a Natura Impact Statement. Matters relating to Appropriate Assessment are addressed in Section 10.3 of this report. The planning application also contains an Arboricultural Survey and Assessment Report, an EIA Screening Report, and habitats and ecological constraints mapping.

- 10.2.5.2. The Board's further information request referred to the submission on the application from the Development Applications Unit of the Department of Housing, Local Government and Heritage and in particular to matters relating to permanent habitat loss and significant disturbance. The applicant was invited to estimate the amount and spatial extent of individual habitats that will be lost and to ensure that there will be 'no net loss' of biodiversity.
- 10.2.5.3. The Board agreed with the Department that tree planting with equivalent numbers of trees to be lost may not provide adequate compensation for the loss of mature woodland habitat. The applicant was invited to consider alternatives such as existing woodland restoration. The proposed removal of over 7,000 trees and their potential to harbour bat species was also noted. The applicant was asked to ensure that all surveys for bats, otter and all protected species are adequate to determine impacts. Further field surveys and investigations for the presence of Annex I priority habitat Alluvial Forest, tufa forming spring/ seepage, Marsh Fritillary and rare plants were also recommended by the Department. A landscaping plan was required, containing measures for the protection and enhancement of biodiversity and referencing the All Ireland Pollinator Plan, 2012-2025. Finally, proposals for assessing recreational disturbance and monitoring during the operational phase were requested by the Department.
- 10.2.5.4. Other items relating to biodiversity within the Board's further information request included measures relating to dog control and the potential for disturbance of birds and mammals. Proposals for dealing with surface water run-off and pollution the water environment are addressed elsewhere in this assessment.
- 10.2.5.5. In response to the issues raised by the Department, the applicant submitted a Fauna Report, and Annex 1 Habitats and Rare Flora report, and landscape plan, proposals for monitoring bird disturbance, a report on the Spatial Extent of Habitats Lost & Woodland Restoration, and a Bats Report. It should be noted that the Department's response to the further information submission did not contain any comment on matters relating to natural heritage.

- 10.2.5.6. The “Special Extent of Habitats Lost & Woodland Restoration” document includes details of replacement planting and other habitat creation and management. It is stated that **loss of habitat** will be adequately compensated for in order to ensure “no net loss” of biodiversity. The loss of 11 hectares of woodland will be adequately compensated for within parcels of land within Wicklow County Council’s and ESB’s ownership. Wind damaged trees will be replaced with native trees and one native tree will be planted on average, every 10m along the greenway.
- 10.2.5.7. A total area of 3.5 ha of grassland will be removed. These areas are typically small and discontinuous. Wildflowers will be sown with a mix of species to offer contrast to the typical verge amenity grass finish. The total area of wetland within the proposed works area is 0.05 ha but the greenway has generally been designed to avoid such areas. A small area of marsh habitat will be removed; however, this is not considered significant in the context of the wider scheme.
- 10.2.5.8. Habitat restoration will occur through a range of broad-scale and site-specific management actions, including retention where possible of important mature trees of high conservation value or with habitat value for bats, birds and mammals; protection and avoidance of areas of high-quality habitat; and establishment of new habitat areas. A key aim of woodland habitat enhancement is to add diversity to the structure of the woodland, e.g. removal of lines of trees to allow additional light for planting of different understorey species. Other actions that would help the biodiversity value include scrub management; control of invasive species; retention of deadwood and habitat piles and standing deadwood; selected felling of Ash affected by dieback; veteranisation; selective felling to create internal woodland edges for a greater variety of species; thinning of woodland to create a woodland glade; understorey and woodland edge planting; creation of a conservation grazing strategy; and grassland restoration and enhancement, including a management cutting and grazing regime to enhance biodiversity value.
- 10.2.5.9. **Tree removal** to accommodate the proposed development was one of the main concerns raised by objectors. However, following submission of the applicant’s “Spatial Extent of Habitats Lost & Woodland Restoration” document as further

information, it appears that tree felling can enhance the biodiversity value of the wooded areas. Increased light penetration into the plantation would allow for greater diversity of woody plants and therefore bird nesting habitat. It would also encourage more flowering plants to develop in the grass and scrub areas, and woody shrub species that flower may be planted to increase value to pollinators. In addition to this, it is submitted that tree felling throughout the shoreline plantation would take place in any case. There are relatively high densities and long stretches of conifer plantation along the proposed route and tree management activities typically involve the clear felling of between 1,750 and 2,500 trees every 2/3 years.

10.2.5.10. Having regard to the fact that the proposed greenway provides a means to improve the biodiversity of the shoreline, together with the proposals for replacement tree planting and mitigation measures such as limiting tree felling to months outside of the bird breeding season, I consider that it is acceptable from a biodiversity viewpoint for tree felling to take place as planned to clear a route for the proposed greenway. I also note the detailed measures in the Outline CEMP for tree protection and mitigation. The impact of the proposed felling on water quality and the issue of carbon release from tree felling vis a vis the carbon sequestering from tree replanting proposals is addressed in other sections of this assessment.

10.2.5.11. As noted above, it was a concern of the Department that trees to be felled may harbour **bats**. In response to this further information item, a desk study and bat report was prepared in 2023. Field surveys involved the selection of transect routes, and transect surveys were undertaken after sunset for four hours on 21<sup>st</sup> September 2023. Signs of bats and bat roosting potential surveys were also carried out by inspecting external areas, including man-made structures. It would appear that the survey for the bat report submitted as further information, together with the initial bat surveys, are now adequate for determining impacts. Signs of bats and bat roosting potential surveys were carried out following “Bat Surveys for Professional Ecologists: Good Practice Guidelines” (Collins 2023).

10.2.5.12. Four species of bat were recorded during bat transect surveys, with activity increasing as hedgerow/ tree lines became denser and taller. The recorded bat

species are of 'least concern' and of 'favourable' conservation status. The site is evaluated as being of Local Importance (Higher Value) for bat species and bat activity was considered to be moderate. It is stated in the Bat Report that large mature trees which are highly suitable as roosting habitat are scarce along the planned route, and less suitable younger trees, are more prevalent. A total of 236 bat roost features were identified in the broad study area and 59 features were recorded within the greenway corridor area, of which 14 were noted as having high bat roosting potential.

- 10.2.5.13. Linear features such as hedges, treelines and waterways are important feeding areas for bats. However, the proposed works are not expected to result in habitat fragmentation within the retained habitats around the reservoir shoreline. Where removal of trees, shrubs or hedgerows is unavoidable, additional hedgerows or tree planting will be carried out using native species so that there is no net loss of linear habitat. Clearance will also take place during daylight hours between May and October.
- 10.2.5.14. The loss of potential bat roosting habitat is considered to be moderately significant in the absence of mitigation. Features of bat roosting potential will be avoided where possible. If moderate to high roost features are to be removed, follow up surveys will be carried out, and if a roost is identified, a bat derogation licence will be obtained from NPWS prior to felling. Trees must be felled appropriately and sensitively following NRA guidelines. Lighting can severely impact on bat roosting, foraging and commuting behaviour; however, it should be noted that the greenway will not be lit. Any lighting that will be required in non-built areas will be bat friendly. Other proposed mitigation measures include installation of bat boxes during clearance works.
- 10.2.5.15. In general, I consider that the information submitted with the application in relation to bats is in accordance with the relevant industry practice and is sufficient to assess the potential impact of the proposed work. Having considered the information submitted, I agree with the conclusion reached within the Bat Report and Ecological

Impact Assessment that significant effects on bats are not anticipated at any geographic scale.

- 10.2.5.16. The Department also requested that surveys for **other mammals**, otter and all species protected under the Wildlife Act, 1976 to 2021 (badger, red squirrel, pine marten and common frog) are adequate to determine all impacts. In response to this request, the applicant prepared a Fauna Report, which presents the survey findings and assesses the ecological impact to fauna species within the footprint of the proposed greenway.
- 10.2.5.17. Mammal surveys were carried out 30m either side of the proposed route and the potential for otter habitat was surveyed upstream and downstream of the crossing point of each watercourse. Badger, pine marten, red squirrel, common frog and Marsh fritillary surveys were carried out, together with a desk top study of National Biodiversity Data Centre. Some sections of the proposed route were constrained due to dense vegetation.
- 10.2.5.18. Badger activity was recorded throughout the survey area around the reservoir and 12 badger setts were identified within the proposed development zone of influence, four of which were noted as active. Partial exclusion of a large active badger sett at Ballyknockan is proposed, and creation of an artificial sett is recommended. Screening and mammal proof fencing will also keep dogs and walkers away from the sett. An observer at Valleymount submits that a badger sett adjacent to their land will be destroyed by tree removal and they offer their land as a diversion to the greenway to avoid the sett. The applicant, however, considers that all other active setts recorded are in areas where path rerouting can occur within EBS lands, thus avoiding sett disturbance. Other mitigation measures are included in the Fauna Report for construction works where there is badger activity.
- 10.2.5.19. One active otter holt was recorded within 25m of the scheme alignment along a watercourse near Ballyknockan. Pre-construction surveys will be required to determine if this is a breeding holt. Signs of otter were recorded mainly along the shoreline, which is outside of the works area. Proposed culvert and bridge crossing works will be minor in nature and will be designed to ensure the free movement of

mammals, including otters. Preconstruction surveys should be conducted along all watercourses 150m upstream and downstream of the crossing points. As otter is a crepuscular species, construction activity will be confined to daylight hours. The operational phase of the greenway will mostly be used in broad daylight and is therefore unlikely to affect this species. The Fauna Report concludes that there is no potential for significant effects on otter as a result of disturbance during the operation of the greenway. As otter is a qualification interest species for the Wicklow Mountains SAC, a further assessment of the effects of the proposed development on this European Site is carried out below.

- 10.2.5.20. It is stated in the Fauna Report and the proposed development site is suitable for red squirrel and direct observations were recorded throughout the study area. It is recommended that works should avoid dreys, otherwise a Section 42 license must be sought before their disturbance and destruction. Nest boxes should be provided for each drey removed and the provision of safe crossing points should be considered where fragmentation is likely to occur. Pre-clearance surveys should be carried out to check for new dreys.
- 10.2.5.21. Evidence of Pine Marten was abundant throughout the survey area, including a number of probable dens. Where any tree with denning potential is removed, it is stated that an artificial pine marten den box should be installed in a suitable nearby tree. Pre-clearance surveys will also be required for this species and no clearance works should take place inside any woodland from March to July.
- 10.2.5.22. The locations of all areas of suitable amphibian habitat are included in the Fauna Report. It is stated that the avoidance of suitable habitat areas and timing of works are the most appropriate mitigation for amphibians. No areas of still water will be entered between December and May, and it is noted that ample opportunities exist for compensation and enhancement of habitat for amphibians.
- 10.2.5.23. Marsh Fritillary butterfly rely on Devil's Bit Scabious and desktop and field surveys were carried for this habitat. The Fauna Report records that devils-bit scabious was absent from all suitable habitats within the scheme area except for small stands and scattered individuals found along a thin strip of dry grassland in Lacken. Follow-up



larval web surveys were conducted along this section of the scheme in September 2023 and no larval webs were found.

- 10.2.5.24. On the whole, the Fauna Report submitted with the further information response provides adequate updated survey information as requested by the Department. Best practice methodologies were employed, and survey limitations were detailed. Potential impacts and mitigation measures for protected fauna are set out, and subject to implementation of these measures, it is considered that the construction of the greenway will not give rise to significant negative impacts upon any of the subject species.
- 10.2.5.25. The possibility of the presence of **Annex I priority habitat Alluvial Forest** on site is examined within the Annex I Habitats and Rare Flora report submitted as further information. Woodland assessment surveys were undertaken to identify positive indicator species and target species, which must be present for the habitat to conform to 91E0 and 91A0, the priority habitats listed on Annex I of Directive 92/43/EEC of the Habitats Directive. Seven locations were surveyed for the presence of alluvial woodland habitat based on previous habitat surveys in 2021. Most high-quality woodland was typically small in size and discontinuous. Some target species and positive indicators were identified; however, it is confirmed that none of the woodlands surveyed corresponded to the annex type 91A0 and 91E0 woodlands based on the general site characteristics and the absence of a sufficient number of both target and positive indicator species. The report includes mitigation measures to prevent impacts to woodlands that should be set out in the CEMP.
- 10.2.5.26. The Department requested further field surveys and investigations for the presence of **tufa forming springs/ seepages**. Surveys were carried out at five locations in December 2023. It is acknowledged that this is not the optimal season for surveying petrifying springs but there are geomorphological features and bryophytes and vascular plant species visible throughout the year.
- 10.2.5.27. The surveys confirm that springs and seepages are generally rare around the reservoir, except in the Baltyboys section of the route. No high-quality indicator species were identified and none were recorded with the key Geomorphological

features that denote this habitat type. It is therefore concluded that the springs and seepages surveyed do not conform to the annex I habitat 7220 Petrifying springs with tufa formation (Cratoneurion). The springs and seepages are still considered a habitat of high local significance and measures are included in the Report to avoid adverse impacts to their hydromorphology, habitat conditions and water quality.

10.2.5.28. Further information was also sought on the presence of **rare plants** around the proposed development site. Additional field surveys were carried out for grassland habitats and rare plants and to inform the report for Annex I Habitats and Rare Flora. Targeted habitat and botanical surveys were carried out to determine whether any habitats aligned with Annex I habitat classifications, or if rare, threatened, and red-listed plants as outlined in the Flora Protection Order (2022) were present in the proposed development footprint. A total of 13 relevés were selected for further analysis based on previous ground surveys. One relevé corresponds to Annex I Semi-natural dry grasslands and scrubland facies on calcareous substrates 6210. This section of grassland is not directly within the greenway footprint, but it is advised that measures should be put in place to prevent damage during construction. A small section of another area of high-quality grassland is along the proposed development site but the majority will remain unimpacted. It is recommended that a grazing management plan should be drawn up to encourage diverse grasslands in this area, resulting in a net positive project impact.

10.2.5.29. The Department stated that a **landscaping plan** is required showing measures for the protection and enhancement of biodiversity and referencing the All Ireland Pollinator Plan, 2012-2025 (AIPP). A landscape plan was prepared as part of the further information submission and details are set out of the management and maintenance actions necessary to protect and enhance landscape and biodiversity along the proposed greenway. Planting species mixes for each of the landscape typologies along the route are included, along with a framework for the long-term management of the scheme, with reference to the AIPP. The different typologies for which plans are drawn up are farmland landscape, lakeshore landscape, mixed

woodland, rural road landscape, and open space landscape. These typologies are reflective of the proposed greenway corridor.

10.2.5.30. The Department sought proposals for assessing **recreational disturbance and monitoring during the operational phase** of the proposed development. An Outline Maintenance and Management Plan was prepared to assess the usage of the greenway, developed in accordance with the Rural Cycleway Design (Offline & Greenway) TII publication. An Environmental Monitoring Plan will be implemented by the applicant, which will be specifically focused on evaluating the impact of the greenway on the local bird population. A report entitled “Proposals for Monitoring Bird Disturbance at Poulaphouca” has been submitted with the further information response. This report proposes a programme of monitoring of bird disturbance following completion of the greenway.

10.2.5.31. The monitoring report highlights that a wide range of human activity, including recreational pursuits and commercial activity, may disturb protected birds. Disturbance can cause birds to lose time feeding or foraging and this may impact on breeding success. Disturbance may therefore result in changes to foraging location, changes in breeding location, changes to roosting locations, reduction in roosting times or even changes to migration routes.

10.2.5.32. I note that the report proposes a programme of monitoring post consent. A total of 16 hours per month of monitoring is proposed following opening of the greenway. Particular emphasis will be placed on Greylag Goose, which is a special conservation interest species for the Poulaphouca Reservoir SPA. This is discussed in further detail under the Appropriate Assessment below. I would be concerned that the applicant’s response to this further information item focuses on monitoring post consent, with little assessment carried out the potential for disturbance. More detailed analysis of the potential for disturbance given the sensitivity of the site is necessary, in my opinion. Estimations of areas of high activity on the proposed greenway are not considered, together with the likely concentrations of species that may be disturbed at these locations. It also needs to be acknowledged that barking dogs or dogs off lead will be disturbing to wildlife in an area such as this.

10.2.5.33. The above issue was highlighted in a number of **submissions**, which considered that noise disturbance during construction has not been fully addressed. It was also a concern that no species-specific surveys were carried out for QI species and no recommendations as to what remedial action they would take if a negative impact occurred. An observer states that no definitive or appropriate recommendations have been put forward to mitigate disturbance to wildlife and habitat for any species of bird or mammal. The bat assessment is considered to be inadequate, with no evidence that certain places were inspected and the qualifications of those who prepared the report are not included. It is submitted that there are nationally significant numbers of Shelduck and Gadwall identified in iWebs data, and this has not been considered. The iWebs data shows observations of Lesser Black-backed gull south-west of Baltyboys-Bloshina Bridge to Poulaphouca Dam and Valkeymount, which are close to the route of the proposed development. In total, there were over 100 objections on various aspects of wildlife, including those relating to water pollution and the aquatic environment, which is assessed in more detail below.

10.2.5.34. It appears from the above that there are lacunae that prevent the full and proper assessment of the proposed disturbance and displacement impacts for sensitive species that are present in the vicinity of the proposed greenway. The impact on species that are of special conservation interest for the SPA and SAC is assessed in the Appropriate Assessment below. However, a programme of bird monitoring is recommended without any recommendations as to what remedial action they would take if a negative impact occurred. Comprehensive surveys are required to determine how areas of high wildlife activity relate to potential areas of high greenway activity. I would agree that recreational disturbance impacts have not been adequately addressed and that no definitive or appropriate recommendations have been put forward to mitigate disturbance to wildlife and habitat for certain species of bird or mammal.

## 10.2.6. **Air Quality & Climate**

- 10.2.6.1. Impacts on **air quality** during construction are likely to occur from dust emissions. There would be a low risk of dust soiling and human health impacts, but nevertheless best practice dust mitigation measure will be implemented.
- 10.2.6.2. The Outline CEMP sets out environmental management procedures and plans on general construction site management to include information on working hours/ periods, site housekeeping, etc. There are potential negative air quality impacts during construction due to emissions from vehicles and plant and dust-raising activities, and this can cause disruption to properties and the public adjacent to the construction works, whilst also having adverse impacts upon other environmental receptors, including watercourses and ecologically designated sites. There will be some minor emissions of greenhouse gases from truck movements and equipment during construction.
- 10.2.6.3. Mitigation measures are proposed so that construction works are carried out in such a manner that emissions of dust and other pollutants are limited, and that best practicable means are employed to minimise disruption, risks to human health, and to avoid unnecessary impacts on sensitive ecological habitats.
- 10.2.6.4. It is stated by the applicant in planning application documentation that the operational phase of the proposed development will give rise to no increase of emissions as it is non-vehicular and will provide alternative routes for walking and cycling while improving accessibility within the area. Notwithstanding this, the Board requested that the applicant carry out a **climate impact assessment** of the proposed development taking into account calculations/ estimations of carbon savings and losses from the construction and operational phases of the greenway. Specifically, the applicant was asked to provide an assessment of the likely carbon release from tree felling vis a vis the carbon sequestering from tree replanting proposals.
- 10.2.6.5. The assessment of climatic impacts was divided into a lifecycle assessment of GHG emissions and a climate change resilience assessment. The total GHG from constructing the proposed development are estimated to be 24,890 tCO<sub>2e</sub>, of which 17,753 tCO<sub>2e</sub> can be attributed to the release of carbon from tree removal. It is

expected that the release of carbon will be recouped throughout the lifetime of the proposed replanted trees. The net GHGs (including all GHG avoidance reductions) from operating the proposed development over a 25-year life are estimated to be 103,080 tCO<sub>2e</sub> (4,123 tCO<sub>2e</sub> annually). It is considered in the Climate Impact Assessment that the proposed development has proportionately small GHG emissions in the context of Ireland's national carbon budget and is not significant in this context.

- 10.2.6.6. The CCR assessment considers chronic climate-related hazards, and the risks associated with an increased frequency of severe weather events. A total of 13 risks were identified but the embedded controls in the design, construction and operation of the asset mean that the risk profile only contains low and medium risks.
- 10.2.6.7. I would question whether the measurement of the GHG emissions of a proposed project in the context of Ireland's overall carbon budget is an appropriate way to measure significance. It is stated within submissions that the IEMA Guidelines "Assessing Greenhouse Gas Emission and Evaluating their Significance" have been misapplied. In this regard, the applicant's Climate Impact Assessment compares project GHG emissions to the total national carbon budget and has not looked at sectoral budgets, how much of the budget is left, and whether transport emissions reductions are below or above target.
- 10.2.6.8. Furthermore, it is submitted that the Climate Impact Assessment does not mention Wicklow County Council's Climate Action Plan adopted in January 2024. The lifetime emissions of the proposed development equate to almost 12% of the total baseline emissions across Wicklow County Council and the annual operational emissions are equivalent to an increase of 1.4% in transport emissions of GHG in Wicklow.
- 10.2.6.9. Having regard to the above, it would appear that GHG emissions, taken in the local context, are more significant, and this appears to be incompatible with the objective of reducing GHG emissions towards net zero by 2050. I note that it will take time to off-set the carbon emissions from loss of trees with replanting. However, I have highlighted above that there are other ecological benefits from clearing trees. It is

also noteworthy that a certain level of tree felling will take place in any case as part of the overall management of the forestry.

10.2.6.10. I recognise that visitors driving to the greenway will also increase greenhouse gas emissions. However, I have also noted above that there is potential for improved sustainable access to the site over time. There should be improvements to public transport and longer distance cycling access to the greenway, together with increased EV access. Operational emissions were calculated within the Climate Impact Assessment using the current proportion of EV to petrol/ diesel cars when EV usage is forecasted to increase, possibly to a significant degree. There may be other hidden benefits to the proposed development from an emissions reduction perspective, e.g. sustainable tourism, supporting local produce and encouraging active travel.

#### 10.2.7. **Noise**

10.2.7.1. A number of objections were made on the grounds of noise nuisance from the proposed greenway. The greenway will only be operational during the daytime and operational noise will be limited to occasional voices and possibly barking dogs. As noted above, the noise from barking dogs may disturb surrounding birds and mammals.

10.2.7.2. Construction noise is likely to have greater impact, but this will occur over a relatively short period. The Outline Construction Method Statement submitted with the application sets out noise control measures to minimise potential impacts during the construction phase. The applicant states that if impacts on roosting or foraging behaviour are identified, possible additional mitigation measures may be required, including screening works with a barrier to assist in noise transmission, and reducing works hours.

#### 10.2.8. **Land and Soils**

10.2.8.1. The proposed development will result in **land** use change with areas of commercial forestry and agricultural land being lost. However, the route is mainly through ESB

lands in a highly modified landscape comprising an artificial reservoir and coniferous plantations. The proposed development essentially involves the upgrading of existing paths around the reservoir, which will improve access and connectivity to publicly owned lands for recreational users. The site of the proposed development is surrounded by woodlands and rising hills and the route continues through the populated areas of Blessington town and Vallemount, Ballyknockan and Lacken villages.

10.2.8.2. With respect to **soils**, some cut will be required along the route of the proposed greenway to facilitate level tie ins and to maintain recommended sight distances and geometric alignment. It is anticipated that circa 36,191 m<sup>3</sup> of ground will be excavated and this material will be used for reinstatement of edges. Total fill including rock armour is anticipated to be approximately 55,652 m<sup>3</sup> for the proposed development. Materials such as macadam for the road/cycle surfacing, clause 804 stone for the sub-base layer will be imported. Construction material will be sourced locally, where possible. It is not envisaged that there will be a need to remove large quantities of excavated material from within the site boundary.

10.2.8.3. Adverse effects could occur during the construction phase in the absence of adequate management and mitigation measures from certain activities, e.g., weathering and erosion of the surface soils, increased silt levels or pollutants from the construction processes, accidental spills and impacted runoff. Best practice standards, environmental guidelines and mitigation measures will be defined in the CEMP and adhered to in order to avoid impacts on soil quality. Measures will be put in place to ensure that soils are protected during works, e.g. soil salvage of wetland/ woodland area. Overall, I would be in agreement that the proposed development will have no significant impact on land and soils in both the construction and operational phases.

#### 10.2.9. **Water**

10.2.9.1. The application is accompanied by a **Flood Risk Assessment**. The level of the reservoir is controlled by ESB for both power generation and water supply purposes.



Water levels are normally within a 1.5m window and levels can rise quite quickly at times following substantial rainfall events, e.g. c. 1m in an 8-12 hour window.

- 10.2.9.2. Poulaphouca Reservoir has a substantial flood storage capacity and is designed to safely discharge floods having an expected annual probability of occurrence of 1 in 10,000 years. OPW flood mapping was consulted, and two flood events were recorded in the vicinity of the proposed route. High lake levels flooded part of the car park at Valkeymount in 2005 and works are proposed to this car park as part of the Baltyboys section of the greenway. The other incident occurred on the Ballynastockan Brook in 2011, causing damage to the Lacken Falls Bridge. The proposed greenway works are downstream of this location as part of the Ballyknockan section. Three major floods were reported by ESB in 1993, 2000 and 2009. A further event of significance occurred in 2015/16.
- 10.2.9.3. The Stage 1 – Flood Risk Identification shows that there is a flood risk to the proposed greenway route from Poulaphouca Reservoir and at watercourse crossing points. There is also a risk from overland flow generated on steep land, particularly to the east of the reservoir. However, a justification test is not required as the proposed greenway is a water-compatible development and would be appropriate subject to suitable mitigation measures.
- 10.2.9.4. Extreme water levels have been considered in the design of the greenway and it is highlighted that access and egress are of critical importance given that levels can rise rapidly. It is recommended that flood forecasting is carried out, and if necessary, water level alert stations will be installed. Culvert and structure design will be adequately sized with suitable inception measures, and if necessary, additional overland flow culverts will be included as part of the design to prevent flooding from overland flows.
- 10.2.9.5. Flooding was not a major issue raised within submissions and I would be satisfied that the proposed development will not exacerbate flooding. However, the impact of the proposed development on other aspects of the water environment was an area of significant concern within submissions. To reflect this, items pertaining to water were raised in the Board's further information request. The applicant was requested

to outline overall proposals for dealing with surface water run-off during construction and operation. Proposals were all sought on wastewater arrangements from toilet facilities, whether connected to the foul sewer network or waste percolation facilities. Lastly, the applicant was requested to address all other items of concern raised by Dublin City Council Water Services and Uisce Éireann.

10.2.9.6. At this point, it should be highlighted that half the water from the Greater Dublin Area is supplied from Poulaphouca Reservoir and therefore the purity of the water is vital to the region. This was emphasised by Dublin City Council Water Services. In addition, Uisce Éireann noted that the protection of the reservoir as a drinking water source is of national importance, and that the proposed development should not impact waters used for the abstraction of drinking water nor cause any deterioration of water quality pre, during and post works.

10.2.9.7. In response to the queries regarding **surface water run-off**, the applicant submitted plans and profile drawings indicating the locations of all known watercourses and ditches that intersect the greenway. A conceptual culvert design is provided to show dimensions and types of structure intended for crossing watercourses. Details of the operational drainage strategy is also included in a report entitled “Blessington Car Park Drainage Summary”. Over the edge drainage is proposed for the greenway, where the run-off is collected in a ditch and then discharged into the lake. It is confirmed that channelised flow down the embankment without sufficient protection should be avoided, and if concentrated flow over the embankment is unavoidable, suitable measures to protect the embankment from scour shall be incorporated. If junctions form part of the design, then other drainage facilities are proposed, with surface drainage intercepting runoff that may accumulate at these constrained locations.

10.2.9.8. For the construction phase, the Outline CEMP sets out control measures and proposals for surface water run-off. Surface water run-off and drainage proposals at car parks were two of the concerns of Dublin City Council, along with water attenuation during construction of bridges and culverts. The applicant confirms that

the contractor's CEMP will address construction methods, scheduling and potential environmental impacts that need mitigation.

- 10.2.9.9. Dublin City Council Water Services responded to the applicant's further information response by acknowledging the many positives of the proposed greenway but also highlighting that the further information is lacking on proposals to deal with surface water run-off. In this regard, it is noted that the Outline CEMP has not been updated and no details have been submitted on surface water attenuation proposals during the construction of bridges and culverts to be developed. Additional information is also required on proposals to deal with surface water run-off from the greenway when completed. In particular, the Council is concerned that surface water drainage being released into the car park extension at Russeltown will put further stress on the already stressed area that is subject to dangerous algae blooms.
- 10.2.9.10. In its initial submission, Uisce Éireann was concerned as to the potential impacts the proposed development could have on Irish Water owned assets in the area, in particular the **drinking water** abstraction point at Poulaphouca Reservoir. It was submitted that the assessment of minor watercourses has been carried out in the context of European sites and there does not appear to be any consideration of what impact the proposed development will have on water quality. It was recommended that an assessment is undertaken to assess the development's potential to impact on the reservoir as a drinking water source and any site-specific measures to mitigate any potential impacts.
- 10.2.9.11. The applicant did not specifically address any of Uisce Éireann's concerns in the further information response. Uisce Éireann stated in its response to the applicant's further information submission that it is generally supportive of the proposed greenway but there are a number of issues that require clarification to ensure protection of the Poulaphouca Reservoir drinking source. It is also noted that the Outline CEMP has not been updated, and that run-off rates are required, together with detailed plans for interceptors and attenuation mechanisms to achieve the run-off rates. A water quality monitoring regime during construction and operation is

required, as well as details of the intersections between the greenway route and Uisce Éireann's infrastructure.

- 10.2.9.12. Uisce Éireann also sought additional information on waste and wastewater connections to support the proposed greenway. It was noted that there are no new **toilet facilities** as part of the proposed development. The lack of toilet facilities was a concern for many observers and for the Board in its further information request. Proposals for toilet facilities to serve the proposed greenway at appropriate locations were requested by the Board. In addition, toilets not connected to the foul sewer network shall demonstrate how waste percolation facilities can be responsibly sited adequate distances away from the reservoir and feeder streams in compliance with the relevant guidance and Development Plan policies. Uisce Éireann stated in its initial submission that no development that will contaminate the drinking water source at Blessington should be granted permission, including wastewater treatment systems and one-off houses. This reflects Wicklow County Council's policy for domestic wastewater treatment systems for PE ≤ 10, which states that *"the minimum separation distance of septic tanks, secondary treatment plants, percolation areas & polishing filters from the Vartry and Blessington Reservoirs (or any other reservoir designated by the Council) shall be 200m."*
- 10.2.9.13. In response to the further information request, the applicant confirmed that toilets are proposed at Blessington Hub but none of the other trailhead locations along the greenway possess a foul sewer network. The proximity to the SPA and waterbody that provides drinking water led to a decision not to provide toilets at these locations. The applicant also highlights that amenities and facilities, including toilets, are accessible in the nearby settlements adjacent to the route.
- 10.2.9.14. It was submitted within objections that public houses within settlements along the route do not open during the day and therefore toilets within these establishments will not be available to greenway users all of the time. Other proprietors state that they have not been consulted about the use of their toilets by greenway users, including the owner of a public house concerned that the toilets at the premises are not connected to mains sewage, and could therefore become overloaded.

- 10.2.9.15. The Rural Cycleway Design (Offline & Greenway) Standards, August 2022 sets out requirements for ancillary infrastructure to serve national and regional greenways. It is stated that a minimum of two toilets are required at a spacing of 40km. Fáilte Ireland's Greenway Visitor Experience & Interpretation Toolkit recommends that toilet facilities should ideally be available approximately every 10 km. In addition, the Greenways and Cycle Routes Ancillary Infrastructure Guidelines states that toilets should be provided at major trailheads. Composting toilets offer an environmentally friendly solution and have lower construction costs with respect to power and effluent treatment, but it is noted that care is required in their selection and location. Chemical toilets are generally not recommended.
- 10.2.9.16. As noted in the Rural Cycleway Design (Offline & Greenway) Standards, route requirements will vary depending on context, e.g. some 40km routes will interface with existing infrastructure and may be well-served by urban population centres. In the case of the proposed Blessington greenway, there only appears to be appropriate toilet facilities within Blessington town. There is no clarity as to the availability and suitability of toilet facilities in other locations along the route.
- 10.2.9.17. Having regard to the sensitivity of the proposed reservoir as a drinking source, I would be concerned that the proposals for toilets are not more certain. Greenway users may be forced into relieving themselves outdoors along the route in the absence of adequate toilet facilities and the applicant has not provided an agreement with any business along the route to use their facilities. The lack of toilets at trailheads is also a concern. I note that Uisce Éireann makes reference to a wastewater treatment plant at Knockieran but there are no toilet proposals at the car park at this location.
- 10.2.9.18. Dog fouling around the lake and the potential impact on water quality is also an issue that was raised in submissions. The Department stated that the impact of dog fouling on water quality must be assessed, as well as the loss of floodplain, which naturally attenuates surface water. Wicklow County Council will provide appropriate signage regarding the control of dogs and will install receptacles for faeces, whilst monitoring compliance with dog control measures. These measures may help to

reduce the impact of dog fouling on water quality; however, the impact has not been assessed and not all owners clean up after their dog. A recent study by Acclimatize2 discovered that dog faeces left on beaches and washed into the sea is the biggest contributor to Dublin bathing spots having poor water quality. A single dog fouling can contaminate an area of water the size of a tennis court with half a metre depth.

10.2.9.19. Other reoccurring issues brought up in submissions were the potential for contamination of drinking water from laying of asphalt/ tarmacadam for the surface of greenway and the imposition of heavy volumes of rock armour, which it is considered will change the character of the water body.

10.2.9.20. Finally, I note that Uisce Éireann sought additional clarifications after the applicant's further information submission. Some of these issues may be addressed by condition or by a request for clarification of further information; however, I note that the applicant did not directly address the concerns of Uisce Éireann as raised in the first submission. Having regard to the national importance of the reservoir, I consider that the potential impact of the proposed greenway on water quality must be dealt with in a comprehensive manner to the full satisfaction of Uisce Éireann and Dublin City Council Water Services. I do not consider that this is the case.

10.2.9.21. In addition to the above, I note that many of the streams that enter the reservoir and will be crossed by the greenway are within wooded areas/ forestry plantations. According to the Department of Agriculture, Food and the Marine document "Environmental Requirements for Afforestation" (June 2024), there should be a water setback in the form of an area left undisturbed during afforestation, from any river, stream or lake. The purpose of this setback is to protect water quality and aquatic ecosystems from possible sediment and nutrient run-off from the site at afforestation and throughout the remainder of the forest rotation. For a moderate slope leading to the aquatic zone, the setback width should be 10m.

10.2.9.22. It appears that the recommended water setbacks were not adhered to, or were not applicable, at the time that the forestry around the reservoir was planted. The plantation appears to continue up to the banks of streams in places without any buffer of natural ground vegetation to protect these watercourses from possible

sediment and nutrient run-off throughout the forestry rotation and particularly from harvesting operations. Greater setbacks are required for steeper slopes leading to the watercourse, for peaty soils and within the catchment of high status objective waterbodies.

10.2.9.23. I have also considered the proposed development in view of the objectives set out in Article 4 of the Water Framework Directive to protect and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration, and having considered the nature, scale and location of the project, I am not satisfied that it has been adequately demonstrated that there is no risk to the Poulaphouca Reservoir waterbody. The likelihood of significant effects and the requirement for further assessment cannot therefore be excluded.

10.2.9.24. In conclusion to this section, I consider that it has not been adequately demonstrated that the proposed greenway will not impact on drinking water quality in the reservoir through surface water run-off, drainage proposals, the lack of toilet facilities, dog fouling, the use of tarmac and rock armouring, and tree felling in proximity to streams. I consider that the proposed development should be refused permission as the relevant authorities are not fully satisfied that the proposal will not affect the treatability of the water source.

#### **10.2.10. Landscape & Visual**

10.2.10.1. The proposed greenway will bring about positive landscape and visual impacts through improved access to an area of scenic amenity and a greater appreciation of extended views of the lakes. In particular, the segregated nature of the greenway allows users to avail of the surrounding environment in safe and comfortable outdoor conditions away from the dangers of passing traffic.

10.2.10.2. The proposed greenway is unique in an Irish context in that it forms a loop when most other greenways are linear. The route of the greenway around the shoreline means that scenic views are available for most of its length. This complies with the “Five S” criteria set out in the Department of Transport’s “Strategy for the Future Development of National and Regional Greenways, 2018” that greenways should be

Scenic, Sustainable, Substantially Segregated and Shared Use, Strategic and offering lots to See and do.

10.2.10.3. The surrounding area is part of the Mountain and Lakeshore Area of Outstanding Natural Beauty as designated in the Wicklow County Development Plan. It is stated that this area is dominated by the lake, views onto and from the lake, and to the east and south, land is more mountainous with attractive views and vegetation. There are protected views along the proposed greenway at the R758 Annacarney, Vallemount (view north-eastwards of Poulaphuca Reservoir), and at the N81, Burgage More, south of Blessington (view of Poulaphuca Reservoir and inlet). Prospects of Special Amenity Value or Special Interest continue along the western lakeshore (N81 at Russborough - Prospect of Russborough House, Russeltown park and towards Poulaphuca Reservoir), and along the eastern lake shore (R758, L8369, L4364 & L4365, Lake Drive from the N81 at Glashina to Oldcourt - Prospect of Poulaphuca Reservoir).

10.2.10.4. There were a number of objections to the visual impact of the proposed greenway. In particular, the visual impact of the proposed rock armour and the tarmac surface of the greenway were cited within numerous submissions. It is suggested that the greenway should have a more natural appearance, and that the extent of rock armour installation will have adverse visual impacts on the shoreline.

10.2.10.5. Development Plan policy CPO 17.36 states that *“any application for permission in the AONB which may have the potential to significantly adversely impact the landscape area shall be accompanied by a Landscape / Visual Impact Assessment, which shall include, inter alia, an evaluation of visibility and prominence of the proposed development in its immediate environs and in the wider landscape, a series of photos or photomontages of the site / development from clearly identified vantage points, an evaluation of impacts on any listed views / prospects and an assessment of vegetation / land cover type in the area (with particular regard to commercial forestry plantations which may be felled thus altering character / visibility). The Assessment shall demonstrate that landscape impacts have been*



*anticipated and avoided to a level consistent with the sensitivity of the landscape and the nature of the designation.”*

10.2.10.6. I note the linear and flat nature of the proposed greenway, and in this regard, the greenway itself will not obstruct a view / prospect or form an obtrusive or incongruous feature in any view / prospect. The Plan & Profile drawings and Rock Armour Proposed Sections and Plans submitted as further information show the extent of rock armour that is proposed. The proposal will see substantial lengths and volumes of rock armour along the lake shore, and I would be in agreement that this could radically change the character and appearance of the shoreline in places. However, I note from drawings that rock armour is not proposed in close proximity to the two Views of Special Amenity Value or Special Interest, and the longest section of rock armour at Baltboys is below the level and concealed from the public road, which is a Prospect of Special Amenity Value or Special Interest. I also note that the purpose of the rock armouring is to prevent erosion and that the Landscaping Plan contains management and maintenance actions necessary to protect and enhance the landscape and biodiversity along the greenway.

10.2.10.7. On balance, I consider that the landscape and visual impact of the proposed greenway will be mostly positive. Notwithstanding this, the Board may consider it appropriate to request a Visual Impact Assessment of the proposed development as clarification of further information having regard to the quantity of rock armour proposed around the shoreline. A crushed stone path may be more appropriate for the setting; however, it should be noted that the Rural Cycleway Design (Offline & Greenway) Standards note that TII Departure Approval is required where “unbound granular base, un-sealed” is proposed, i.e., there is a specific need to align with a rural aesthetic, including colours, environmental sensitivities, and traffic volumes are such that the increased maintenance need and reduced levels of ride quality do not have a significant cumulative impact on users.

#### 10.2.11. **Cultural Heritage**

- 10.2.11.1. In the request for further information, the Board noted the submission from the Department of Housing, Local Government and Heritage in relation to archaeology and invited the applicant to consult with the Department to agree the scope of archaeological testing of the foreshore/ underwater archaeological survey and a programme of archaeological mitigation measures.
- 10.2.11.2. In response, the applicant confirmed that consultations had been held with the Department and consequently a “Briefing Note of Archaeological Mitigation” was prepared. This Briefing Note sets out a mitigation strategy for the cultural heritage that will be affected by construction works. Mapping is included of the proposed greenway in the context of surrounding heritage assets. Sites and Monuments Records and their zone of influence are illustrated. The mapping also shows the Blessington Archaeological Conservation Area, National Inventory of Architectural Heritage sites, protected structures and planned landscapes. Areas subject to archaeological monitoring are outlined, as well as the extent of rock armouring works that will be archaeologically monitored. Off-site tree planting at Burgage, the Avon and Knockieran will be archaeologically tested and Knockieran and Russeltown car parks will be archaeologically monitored. Measures will be implemented during construction to reduce settings impacts to the ACA. Proposed culvert locations to be constructed under archaeological supervision are also illustrated.
- 10.2.11.3. Proposed groundworks could potentially impact on sub-surface archaeological features. Archaeological monitoring of all groundworks will be carried out where deemed appropriate. A condition reflecting same and as recommended by the Department will be attached to any grant of permission.
- 10.2.11.4. The Department also highlighted that there may be objects of built heritage significance (such as boundary walls, granite copings, piers, etc.) that are strewn around the villages along the shore of the lake, and there may be the opportunity to integrate new stone elements in the tradition of the area as a way to mitigate the impact of new infrastructure. The input of a conservation architect is recommended, and it is advised that interventions to the cultural landscape should have regard to protected views and vistas and the setting of Russborough House.

10.2.11.5. Should the Board be minded to grant permission for the proposed development, a condition can be attached that requires a conservation architect to be retained to oversee the site set up and construction of the proposed development and implementation of mitigation measures relating to cultural heritage.

#### 10.2.12. **Consideration of Alternatives**

10.2.12.1. A number of alternatives were put forward in submissions relating to various aspects of the greenway. The main opposition is to the Tulfarris section of the greenway, and in response, the applicant decided at further information stage to redefine this section as a link route. I have recommended above that if the Board is minded to grant permission for the proposed development, the Tulfarris link section should not form part of the main greenway.

10.2.12.2. Other submissions put forward the alternative of the greenway bypassing Blessington town centre through publicly owned lands along the lakeshore. The purpose of this proposal is to avoid any greenway conflicts in the town centre between greenway users, pedestrians, motorists and deliveries. A number of submissions propose a shorter route from Blessington to Poulaphouca to Tulfarris and back. Other parties recommended a greenway more like the existing section in terms of surface and width, and the use of existing roads was put forward by other parties.

10.2.12.3. In terms of surfacing, the pavement proposed is to be provided in accordance with TII publication Rural Cycleway Design (Offline & Greenway) DN-GEO-03047 August 2022. Given the location and environmental sensitivities of the proposed development, it may be more appropriate to align with the rural aesthetic and to surface the greenway in crushed stone. However, there are expected to be significant volumes of greenway users, and the proposed surface may be more suitable for maintenance reasons.

10.2.12.4. In terms of the routing of the proposed greenway, I am of the opinion that a loop around the lakes will provide a suitable length for users, with different character and aspects throughout. Parking around the lakes will allow walkers to use different

sections and the 33km loop can be cycled in 2 hours or less. The Strategy for the Future Development of National & Regional Greenways states that greenways should meet satisfactory standards of width, gradient and surface condition, and should be at least 20km in length and ideally closer to 40km.

10.2.12.5. Overall, I consider that the route of the proposed greenway would be the most preferential and would be of an appropriate length. An existing stretch of greenway would be incorporated, and the gradient throughout would be suitable for all users. The alternative of using existing roads would not be suitable for greenway standard due to the gradient and the lack of segregation. I am also limited to assessing the designed scheme that is before me, and I consider that the proposal has the potential to offer a high quality visitor experience. There may be some issues in terms of conflicts in Blessington town centre; however, the routing of the greenway through the town offers greater potential for businesses to benefit from the greenway and also provides greenway users with better access to local amenities.

### 10.3. **The likely significant effects on a European site (Appropriate Assessment)**

10.3.1. The areas addressed in this section are as follows:

- Compliance with Articles 6(3) of the EU Habitats Directive
- Geographical Scope and Main Characteristics
- The Natura Impact Statement and associated documents
- Appropriate Assessment of implications of the proposed development on each European site

10.3.2. **Compliance with Articles 6(3) of the EU Habitats Directive:** The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent

authority must be satisfied that the proposal will not adversely affect the integrity of the European site.

### **10.3.3. Geographical Scope and Main Characteristics**

- 10.3.3.1. An existing 5km length of greenway between Blessington and Russborough House will be upgraded, and the new 25km length of greenway will be constructed. The remaining sections will consist of an urban cycling scheme/ traffic calming. Overall, the proposed development will cover an area of 16.64 hectares with an additional area of 3.34 hectares for earthworks during construction. The construction phase of the proposed development is likely to be 18 months.
- 10.3.3.2. The reservoir is located at the west side of the Wicklow Mountains. Land rises to the east of reservoir to a peak of 849m OD at the summit of Mullaghecleevaun. The water levels in the reservoir are normally within a 1.5m window and data for Poulaphouca headrace from 19<sup>th</sup> November 2020 shows levels of between 184.2 and 185.7m OD Poolbeg (181.5 to 183.0m OD Malin). A number of streams (former tributaries of King's River) enter the eastern side of the reservoir. These include Templeboodin Stream, Ballynastockan Brook and Annacarney Stream. However, the two main sources of water for the reservoir are the River Liffey to the north and King's River to the south. Before the reservoir was created, the confluence of King's River and the Liffey River was to the south of Blessington and north of the Baltyboys peninsula. The site is within the Liffey and Dublin Bay WFD catchment, the Liffey\_SC\_020 sub-catchment and the Liffey\_040 river sub-basin.
- 10.3.3.3. The main ecological feature in the study area is the reservoir itself which has a surface area of approximately 20 sq.km. The reservoir was created in 1944 by damming the River Liffey. Much of the lakeshore is fringed with woodland with the most common types being willow, ash and alder woodlands, as well as conifer plantations. Dry neutral grassland which is mostly fallow is also a common habitat type in the subject lands. Freshwater habitats recorded in surveys included wet grassland, tall-herb swamps, springs, streams and small watercourses.

- 10.3.3.4. The Poulaphouca Reservoir SPA designation covers all of Blessington Lakes. The qualifying interest species are Greylag Goose and Lesser Black-backed Gull. The Wicklow Mountains SAC and Wicklow Mountains SPA are located a short distance to the east. Qualifying interest species for the Wicklow Mountains SPA are Merlin and Falcon. Otter is one of the qualifying interest species for the SAC. Most of the greenway will be located outside of the Poulaphouca Reservoir SPA; however, there will be widening and resurfacing of the existing greenway and sections of lakeshore protection within the SPA. The Wicklow Mountains SPA and Wicklow Mountains SAC are approximately 350m from the site boundary.
- 10.3.3.5. The landscape surrounding the reservoir is dominated by improved and wet grassland interspersed by patches of woodland of both native and conifer plantation along with residential developments. Blessington is the main town, which is located on the north-western shore and there are villages along the southern and western shores at Valkeymount, Ballyknockan and Lacken.
- 10.3.3.6. The greenway will be predominantly off road and through forest and woodlands adjacent to the reservoir shoreline over a distance of 33km. The proposed development comprises a predominately off-road, 3-4m wide shared use, machine-laid and bound path for pedestrians and cyclists. Construction works will include shallow excavation (200-300mm), tree removal and replacement, installation of culverts and single span bridges over streams, fencing and minor landscaping. Other ancillary works will include site clearance, construction of a boardwalk or other pathway, and installation of rock armour to arrest and prevent shoreline erosion and to allow a base for the greenway construction.

#### 10.3.4. **Natura Impact Statement and Associated Documents**

- 10.3.5. Wicklow County Council made a determination on 21<sup>st</sup> December 2021 that a Stage 2: Appropriate Assessment is required to inform the proposed development of the Blessington eGreenway project, either alone or in combination with other plans or projects with respect to any Natura 2000 sites and its conservation objectives.

- 10.3.6. The Appropriate Assessment Screening Report and Natura Impact Statement dated December 2021 were submitted to the Board on 14<sup>th</sup> January 2022. Following a request for further information, the applicant submitted an updated AA Screening Report and NIS, which was received by the Board on 26<sup>th</sup> January 2024. Issues raised by the Board in the further information request included the potential impact of dog fouling on water quality and dogs roaming off lead being a source of disturbance to birds and mammals; drainage arrangements and surface water run-off during construction and operation; and proposals for monitoring and evaluation.
- 10.3.7. The Board's further information request also referred to matters raised by the Department of Housing, Local Government and Heritage in relation to habitat loss and significant disturbance. This included a request for proposals for assessing recreational disturbance and monitoring during the operational phase. The Department referred to a number of matters relating directly to Appropriate Assessment. Further consideration was sought of disturbance impacts to special conservation interest bird species for the Poulaphouca Reservoir SPA, and of the likely significant effects on the Wicklow Mountains SAC due to the presence of otter. The applicant was also invited to consider the impact of the existing 6km trail in combination with the proposed development, as well as tree felling and tree management activities, and all other projects and plans in the vicinity of the proposed development.
- 10.3.8. The updated NIS following the further information request examines the effects of the proposed Blessington eGreenway alone, and in-combination with any other projects and activities, on the integrity of European sites in respect of their conservation objectives and their structure and function. The NIS Appendices include (a) Mitigation Measures [Appropriate Assessment] Matrix, (b) Proposed Construction Methodologies, and (c) a drawing of proposed Blessington eGreenway Route and Poulaphouca Reservoir SPA. Other documentation submitted with the planning application and further information response includes an Arboricultural Survey and Assessment Report; Outline CEMP; EIA Screening; Ecological Impact Assessment; Flood Risk Assessment; outline Management and Maintenance Plan;

Monitoring and Evaluation Plan; Blessington Car Park Drainage Summary; Spatial Extent of Habitat Lost & Woodland Restoration Report; Bat Report; Fauna Report; Annex I Habitats and Rare Flora Report; and a document on Proposals for Monitoring Bird Disturbance.

10.3.9. In general, I am satisfied that the updated Appropriate Assessment Screening Report and Natura Impact Statement submitted as further information adequately describes the proposed scheme, the project site and the surrounding area. The Stage 1 Screening Assessment concluded that a Stage 2 Appropriate Assessment (NIS) was required. The Appropriate Assessment Screening Report and NIS outlined the methodology used for assessing potential impacts on the habitats and species within the European sites that have the potential to be affected by the proposed development. It predicted the potential impacts for the site and its conservation objectives, detailed mitigation measures, assessed in-combination effects and identified any residual effects on the European site and its conservation objectives.

10.3.10. The Appropriate Assessment Screening Report and NIS were informed by the following studies, surveys and consultations:

- Desk study including NPWS databases on protected birds and species,
- Stakeholder consultation including the following:
  - NPWS – communication with Ranger on special conservation interest and other protected species,
  - ESB – Fisheries Biologist did not foresee any issue with regards to fisheries interests of the ESB and provided comments and updates.
  - Wicklow County Council – Consultation with Heritage Officer on aspects of project, in particular with regard to timing and extent of clearance.
  - Inland Fisheries Ireland – Fisheries Environmental Officer confirmed that IFI do not hold fisheries information on the watercourses crossed by the proposed route. Completed environmental assessments and watercourse crossing structures to be submitted to IFI when available.



- Birdwatch Ireland - iWeBS data received.
- Irish Wildlife Trust – review of information.
- Field surveys:
  - Baseline ecological conditions assessed between 12<sup>th</sup> & 14<sup>th</sup> August 2020 and 23<sup>rd</sup> October 2020.

Habitat types and their usage readily identifiable due to presence of certain species, evident throughout the year.

Habitats classified in according to Fossitt (2000).

Potential sources and pathway for pollutants identified, particularly suspended solids to reach the Poulaphouca Reservoir SPA.

- Additional field surveys, targeting specific habitats and species were carried out between July & November 2023.

10.3.11. The initial NIS concluded that, in light of the objective scientific information, that, when the mitigation measures are correctly implemented, the project, individually or in combination with other plans and projects, will not have an adverse effect on the integrity of the Poulaphouca Reservoir SPA, in view of its conservation objectives and in view of best scientific knowledge.

10.3.12. The NIS submitted to the Board in January 2024 as further information states that the screening assessment could not definitely rule out impacts to the SCI for which the Poulaphouca Reservoir SPA has received designation. Furthermore, impacts upon a qualifying interest of the Wicklow Mountains SAC, namely otter, could not be definitely ruled out.

10.3.13. Given the nature of potential impacts that could arise from the construction and operational phase of the proposed scheme, together with the nature of SCIs identified for these European Sites, as well as the survey work completed to inform the submitted NIS, I consider that there is sufficient detail on file to allow full consideration of potential impacts on the Poulaphouca Reservoir SPA and the Wicklow Mountains SAC.

#### 10.4. Appropriate Assessment of implications of the proposed development on each European Site

10.4.1. I consider that the proposed development the Blessington eGreenway is not directly connected with or necessary to the management of any European site.

10.4.2. Having regard to the information and submissions available, nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source pathway receptor principle and sensitivities of the ecological receptors the following European Sites are considered relevant to include for the purposes of initial screening for the requirement for Stage 2 appropriate assessment on the basis of likely significant effects:

10.4.3. European sites considered for Stage 1 screening:

European site (SAC/SPA)	Site code	Distance to subject site	Connections (source, pathway, receptor)	Considered further in Screening (Y/N)
Poulaphouca Reservoir SPA	004063	Adjoining/ within	Potential connections	Y
Wicklow Mountains SAC	002122	350m east	Potential connections	Y
Wicklow Mountains SPA	004040	350m east	Absence of pathways	N
Red Bog Kildare SAC	000397	2.96km north	Absence of pathways	N
Glenasmole Valley SAC	001209	12.55km north-east	Absence of pathways	N
Slaney River Valley SAC	000781	9.8km south	Absence of pathways	N

**Table 1** – Summary Table of European Sites considered in Screening for Appropriate Assessment

10.4.4. Based on my examination of the Appropriate Assessment Screening Report and NIS, together with other supporting information, the NPWS website, aerial and satellite imagery, the scale of the proposed development and likely effects, separation distances and functional relationships between the proposed works and the European sites, their conservation objectives, and taken in conjunction with my

assessment of the subject site and the surrounding area, I conclude that a Stage 2 Appropriate Assessment is required for the following European Sites in view of the conservation objectives of those sites:

- Poulaphouca Reservoir SPA
- Wicklow Mountains SAC

10.4.5. The remaining sites can be screened out from further assessment because of the scale of the proposed works, the nature of the Conservation Objectives, Qualifying and Special Conservation Interests, the separation distances and the lack of a substantive ecological linkage, hydrologically or otherwise, between the proposed works and the European sites. Indirect terrestrial or aquatic habitat loss or degradation will not occur in all sites screened out due to the absence of hydrological connectivity and/ or the separation distance between construction works, or any operational stage work. There is potential hydrological connectivity to European sites within Dublin Bay. However, the downstream distance to these sites is substantial to an extent that no significant effects on qualifying interest habitat or species can occur.

10.4.6. It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on Glasamole Valley SAC (001209), Red Bog Kildare SAC (000397), Slaney Valley River SAC (000781) and Wicklow Mountains SPA (004040) in view of the sites' conservation objectives and a Stage 2 Appropriate Assessment for these sites is not therefore required. I am therefore satisfied that no additional sites other than those assessed in the NIS need to be brought forward for Appropriate Assessment.

10.4.7. The following is an assessment of the implications of the project on the relevant conservation objectives of the European sites using the best scientific knowledge in the field. All aspects of the project which could result in significant effects are

identified and mitigation measures designed to avoid or reduce any adverse effects are examined and assessed.

10.4.8. I have relied on the following guidance:

- DoEHLG (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, National Parks and Wildlife Service.
- EC (2002) Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EC
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC

10.4.9. **Relevant European sites:** The following sites are subject to appropriate assessment.

- Poulaphouca Reservoir SPA (Site code: 004063)
- Wicklow Mountains SAC (Site code: 002122)

10.4.10. A description of these sites and their Conservation Objectives and Qualifying Interests, including any relevant attributes and targets for these sites, are set out in the NIS and outlined in Tables 2 & 3 below. I have also examined the Natura 2000 data forms as relevant and the Conservation Objectives supporting documents for these sites available through the NPWS website ([www.npws.ie](http://www.npws.ie)).

10.4.11. **Aspects of the proposed development:** The main aspects of the proposed development that could adversely affect the conservation objectives of the European sites include:

- Potential changes to surface water quality (e.g. siltation, pollution, turbidity) arising from construction works over or near watercourses.
- Operational stage impacts on water quality from dog fouling, lack of toilets and hydrocarbon pollution from car parking expansion.

- Disturbance and displacement impacts on SCI birds and otter during the construction and operational phases.
- Clearance of shoreline vegetation, installation of rock armour and reduction/fragmentation of habitat area for otter.

10.4.12. **Tables 2 and 3** summarise the appropriate assessment and site integrity test. The conservation objectives, targets and attributes as relevant to the identified potential significant effects are examined and assessed in relation to the aspects of the project (alone and in combination with other plans and projects). Mitigation measures are examined, and clear, precise and definitive conclusions reached in terms of adverse effects on the integrity of European sites.

10.4.13. Supplemental to the summary tables, any key issues that arose through consultation and through my examination and assessment of the NIS are expanded upon in the text below:

**Table 2 - Wicklow Mountains SAC (Site code: 002122)**

Key Issues:

- Habitat degradation / effects on QI / SCI species as a result of hydrological impacts.
- Disturbance and displacement impacts.
- Habitat loss and fragmentation

**Conservation Objectives:** [https://www.npws.ie/sites/default/files/protected-sites/conservation\\_objectives/CO002122.pdf](https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002122.pdf)

		Summary of Appropriate Assessment			
Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans & Programmes/ Major Projects	Can adverse effects on site integrity be excluded?
To maintain the favourable conservation condition of the following:	The favourable conservation status of a species is achieved when:				

<p>[1355] Lutra lutra (Otter)</p>	<p>No significant decline in distribution, extent of terrestrial and freshwater habitat, coupling sites and holts and available fish biomass. No significant increase in barrier to connectivity.</p>	<ul style="list-style-type: none"> <li>- Change to surface water quality (e.g. siltation, pollution, turbidity) during construction. Such an event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the otter population through direct contact with pollutants, habitat quality impacts, or a decline in fish prey.</li> <li>- Construction works could result in disturbance to and potentially displacement of otter, particularly if works are undertaken at night-time.</li> <li>- Operational impacts on water quality from dog fouling, lack of toilets and hydrocarbon pollution from car parking expansion.</li> </ul>	<ul style="list-style-type: none"> <li>- Outline CEMP prepared to address water quality impacts arising from the proposed works. On appointment, contractor will engage an environmental scientist/ ecologist to assist with site-specific CEMP.</li> <li>- All works within 150m of otter holt must occur under licence or in agreement with NPWS and in consultation with the local conservation ranger, and otter activity to be monitored for at least 6 months prior to works. Other measures including restriction of access near holt, toolbox talks, daylight working, pollution prevention measures, covering/ fencing of excavation works, and no wheeled or tracked vehicles within 20m of active holt.</li> <li>- Works should be temporarily stopped and</li> </ul>	<p>No in combination effect:</p> <ul style="list-style-type: none"> <li>- Plans subject to AA prior to adoption and contain policies and objectives to ensure protection of European sites.</li> <li>- Proposed developments along the route will be subject to planning consent, including AA screening and NIS as required, and it will be necessary to determine that the projects will not result in adverse effects on European sites.</li> <li>- Proposed scheme alone will not adversely affect the integrity of any European sites, and therefore will not act in combination any other plans or projects to have an adverse effect on the integrity of any European sites.</li> </ul>	<p>No Not demonstrated if mitigation measures are adequate to address impacts on water quality during both construction and operational phases.</p> <p>Uncertainty as to whether construction and operational water quality impacts will lead to a deterioration of supporting ecological requirements for Otter in an ex-situ capacity.</p>
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		<ul style="list-style-type: none"> <li>- Operational phase disturbance from increased human presence and noise.</li> <li>- Habitat loss and fragmentation through clearance work or laying of rock armour.</li> </ul>	<p>ecologist consulted if an otter is encountered.</p> <ul style="list-style-type: none"> <li>- No works should be undertaken within 150m holt at which breeding females or cubs are present and works must only occur when cubs are weaned.</li> <li>- Riparian habitat lost or damaged should be restored as fully as possible post construction.</li> <li>- Otter activity at the holt should continue to be monitored for 1 month after construction.</li> <li>- Outline Management and Maintenance Plan has been prepared which</li> </ul>		
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			<p>details measures for the control of dogs and includes a code of conduct for greenway users.</p> <p>- Further information response includes a car park drainage summary, whereby greenway runoff is collected in a ditch and then discharged into the lake. Channelized flow down the embankment without sufficient protection will be avoided and suitable measures will be put in place to protect from scour.</p>		
[3110] Oligotrophic waters containing very few minerals of sandy plains	Habitat area stable/ increasing; no decline in habitat distribution; typical species present; appropriate vegetation composition & distribution characteristics; appropriate hydrological regime and lake	As the SAC is located upstream of the proposed scheme and at a substantial hydrological distance, there is no potential for a pollution event of	N/A	N/A	N/A

	substratum quality; appropriate water quality, acidification status and colour; appropriate dissolved organic carbon and turbidity; and appropriate fringing habitat.	any magnitude to affect any QI habitats or associated plant species for which the site is designated.			
[3160] Natural dystrophic lakes and ponds	As above				
[6130] Calaminarian grasslands of the <i>Violetalia calaminariae</i>	No decline in habitat area or distribution; maintain adequate open ground and high copper levels in soils; maintain low and open vegetation and diversity and populations of metallophyte bryophytes.				
<b>To maintain the favourable conservation condition of the following:</b>	<b>The favourable conservation status of a species is achieved when:</b>				
[4010] Northern Atlantic wet heaths with <i>Erica tetralix</i>	Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; maintain variety of vegetation communities; appropriate vegetation composition for cross-leaved heath, positive indicator species, lichens and bryophytes, ericoid species and crowberry, dwarf shrub species, negative				

	indicator species and non-native species, native trees and shrubs, bracken and soft rush; appropriate vegetation structure in terms of sphagnum condition, signs of browsing and burning; appropriate physical structure in terms of disturbed bare ground and drainage; and no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.				
[4030] European dry heaths	Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; maintain variety of vegetation communities; appropriate vegetation composition for lichens & biophytes, positive indicator species, dwarf shrub species, negative indicator species and non-native species, native trees and shrubs, bracken, and soft rush; appropriate vegetation structure in terms of ling, signs of browsing and burning; appropriate physical structure in terms of disturbed bare ground; and no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.				

[4060] Alpine and Boreal heaths	Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; maintain variety of vegetation communities; appropriate vegetation composition for lichens & biophytes, positive indicator species, dwarf shrub species, negative indicator species and non-native species; appropriate vegetation structure in terms of signs of grazing, browsing, burning and disturbed bare ground; and no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.				
[6230] Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)	Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; maintain variety of vegetation communities; appropriate vegetation composition for positive and high quality indicator species, species richness, non-native and negative indicator species, sphagnum and polytrichum cover and shrubs, bracken and heath cover; appropriate vegetation structure in terms of forb to graminoid ratio, sward height, litter cover, disturbed bare ground and grazing or disturbance; and no				

	decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.				
[7130] Blanket bogs (* if active bog)	Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; at least 99% of the total Annex I blanket bog area active; natural hydrology unaffected by drains and erosion; maintain variety of vegetation communities; appropriate vegetation composition for positive indicator species, lichens and bryophytes, potential dominant species, negative indicator species and non-native species and native trees and shrubs; appropriate vegetation structure in terms of sphagnum condition, signs of browsing and burning; appropriate physical structure in terms of disturbed bare ground, drainage and erosion; and no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.				

<p>[8110] Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>)</p>	<p>Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; appropriate vegetation composition for lichens and bryophytes, negative indicator species, non-native species, positive indicator species, grass species and dwarf scrubs and bracken, native trees and scrubs; appropriate vegetation structure in terms of grazing and browsing; appropriate physical structure in terms of disturbance; and no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.</p>				
<p>[8210] Calcareous rocky slopes with chasmophytic vegetation</p>	<p>Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; appropriate vegetation composition for positive indicator species, non-native species, and bracken, native trees and scrubs; appropriate vegetation structure in terms of grazing and browsing; and no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.</p>				

[8220] Siliceous rocky slopes with chasmophytic vegetation	Stable/ increasing habitat area; no decline in habitat distribution; maintain soil nutrient status; appropriate vegetation composition for positive indicator species, non-native species, and bracken, native trees and scrubs; appropriate vegetation structure in terms of grazing and browsing; and no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat.				
[91A0] Old sessile oak woods with Ilex and Blechnum in the British Isles	Stable/ increasing habitat area; no decline in habitat distribution; woodland area stable/ increasing; appropriate woodland structure for cover and height, community diversity & extent, natural regeneration, dead wood, veteran trees, indicators of local distinctiveness; and appropriate vegetation composition for native tree cover and negative indicator species.				
<b>Overall Conclusion: Integrity test</b>  The applicant determined that following the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.					

Based on the information provided, I am not satisfied that adverse effects can be excluded for Wicklow Mountains SAC. There is no potential for effects to arise on the designated habitats of the SAC from the proposed scheme. There is potential for adverse effects on otter as territories can be over 13km in length along watercourses and therefore otter will be found both within and outside the Wicklow Mountains SAC. Certain adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the receiving waters. Other specific mitigation measures that have been incorporated in order to prevent disturbance to otters and to restore riparian habitat. However, there are other potential impacts to water quality during construction and operational phases, such as the laying of rock armouring, tree felling, hydrocarbon pollution, dog fouling and lack of toilets that have not been adequately assessed and mitigated against.

Based on the information submitted, surveys carried out and analysis provided, I consider that uncertainty remains as to the impact of the proposed development on the water environment.

**The proposed development would therefore delay or prevent the attainment of the Conservation objectives of the Wicklow Mountains SAC in relation to Otter.**



**Table 3 - Poulaphouca Reservoir SPA (Site code: 004063)****Key Issues:**

- Habitat degradation/ effects on QI/SCI species as a result of hydrological impacts.
- Disturbance and displacement impacts.

**Conservation Objectives:** [https://www.npws.ie/sites/default/files/protected-sites/conservation\\_objectives/CO004063.pdf](https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004063.pdf)

		Summary of Appropriate Assessment			
Conservation Objective	Targets & Attributes (as relevant)	Potential adverse effects	Mitigation Measures	In-combination effects of Plans & Programmes/ Major Projects	Can adverse effects on site integrity be excluded?
<b>To restore the favourable conservation condition of the following:</b>	<b>The favourable conservation status of a species is achieved when:</b>				
Greylag Goose <i>Anser anser</i> [A043]	Long term winter population stable or increasing; sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population target; disturbance levels do not significantly impact the achievement of targets for population trend and spatial	- Change to surface water quality (e.g. siltation, pollution, turbidity) during construction. Such an event of a sufficient magnitude, either alone or cumulatively with other pollution	- Outline CEMP prepared to address water quality impacts arising from the proposed works. On appointment, contractor will engage an environmental scientist/ ecologist to assist with site-specific CEMP.	All other plans/ projects, including those in the immediate vicinity of the proposed scheme, have been considered in the context of in combination effects and must comply with	No  Not demonstrated if mitigation measures are adequate to address impacts on water quality during both construction

	distribution; barriers do not significantly impact the wintering population's access to the SPA or other ecologically important sites outside the SPA; sufficient number of locations, area of suitable habitat and available forage biomass and suitable roosting habitat to support the population target; and sufficient area of utilisable habitat available in ecologically important sites outside the SPA.	sources, could potentially affect the SCI species population through direct contact with pollutants, impacts on the quality of habitat that support the SCI species, or through a decline in fish prey.  - Operational impacts on water quality from dog fouling, lack of toilets and hydrocarbon pollution from car parking expansion.	- All works crossing watercourses to be carried out in accordance with TII and IFI guidance.  - Good site practises as described by CIRIA (2006) to be followed.  - Works areas to be limited and strictly delineated around watercourses; designated storage areas away from watercourses/ reservoir; maintenance of silt fencing; toolbox talks; staff overseeing good practises; no works following heavy rainfall/ flooding; and maintenance of spill-kits on site.  - Outline Management and Maintenance Plan has been prepared which details measures for the control of dogs and includes a code of conduct for greenway users.  - Further information response includes a car park drainage summary, where	all applicable planning and environmental approval requirements and be in accordance with the environmental protection objectives and policies of the relevant land use plans. However, there is insufficient information available to determine what parts of the lake and adjoining lands are utilised by SCI bird species for feeding or foraging and if the proposal would act in combination with other planned or ongoing projects to have adverse effects on the integrity of a European site.	and operational phases.  Impacts on water quality could result in degradation of supporting lake habitat for SCI species.  Not demonstrated that the proposed development will not result in disturbance/ displacement of SCI species during roosting and foraging.
<b>To maintain the favourable conservation condition of the following:</b>	<b>The favourable conservation status of a species is achieved when:</b>				
Lesser Black-backed Gull <i>Larus fuscus</i> [A183]	Long term winter population stable or increasing; sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population target; disturbance levels do not significantly impact the achievement of targets for population trend and spatial distribution; barriers do not significantly impact the wintering	- Disturbance to wintering SCI species from construction works. Operational phase disturbance from increased visitor usage, including dogs barking and roaming off lead.			

	population's access to the SPA or other ecologically important sites outside the SPA; sufficient number of locations, area of suitable habitat and available forage biomass and suitable roosting habitat to support the population target; and sufficient area of utilisable habitat available in ecologically important sites outside the SPA.		greenway runoff is collected in a ditch and then discharged into the lake. Channelized flow down the embankment without sufficient protection will be avoided and suitable measures will be put in place to protect from scour.  - Proposals for monitoring of bird disturbance following the opening of the greenway.		
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#### Overall Conclusion: Integrity test

The applicant determined that following detailed assessment of potential impacts and the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site in view of its conservation objectives.

Based on the information provided, I am not satisfied that adverse effects can be excluded for Poulaphouca Reservoir SPA. Certain adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the watercourses draining to the reservoir and the reservoir itself. However, there are other potential impacts to water quality during construction and operational phases, such as the laying of rock armouring, tree felling, hydrocarbon pollution, dog fouling and lack of toilets that have not been adequately assessed and mitigated against. This could result in degradation of supporting lake habitat.

The potential impacts in terms of disturbance to wintering SCI bird species has not been adequately assessed and mitigated against. Both SCI species roost on the reservoir but it is unclear where Lesser black-backed gull forages, and post consent monitoring cannot be relied upon to identify further adverse disturbance effects for both SCI species.

Based on the information submitted, surveys carried out and analysis provided, I consider that uncertainty remains as to the impact of the proposed development on the water environment and SCI species.

**The proposed development would therefore delay or prevent the attainment of the Conservation objectives of the Poulaphouca Reservoir SPA.**

**Relevant European site: Wicklow Mountains SAC (Site code: 002122)**

- 10.4.14. The site synopsis states that the Wicklow Mountains SAC is a complex of upland area, most of which is over 300m, with much ground being over 600m. The Blessington Reservoir flanks the SAC to the west, and in general, the western part of the SAC consists of an elevated moorland, covered by peat. It is noted that the Wicklow Mountains are drained by several major rivers including the Dargle, Liffey, Dodder, Slaney and Avonmore, and the water in the mountain areas is often peaty, especially during floods. Mammals typical of upland areas include deer, hare, badger and otter, the latter being a species listed on Annex II of the E.U. Habitats Directive and a qualifying interest of the SAC.

*Baseline Ecological Conditions*

- 10.4.15. The main ecological feature in immediate surroundings of the proposed development site is the reservoir. The reservoir is fed by the River Liffey and King's River and there are a number of smaller streams, (former tributaries of King's River) that enter the eastern side of the reservoir. These include Templeboodin Stream, Ballynastockan Brook and Annacarney Stream. The proposed greenway will be constructed around the shore of Poulaphouca Reservoir, mainly through existing forestry plantations and woodland.
- 10.4.16. Field surveys were conducted for the initial Appropriate Assessment Screening Report and NIS on 12<sup>th</sup> and 14<sup>th</sup> August and again on 23<sup>rd</sup> October 2020. Following a request for further information, additional field surveys, targeting specific habitats and species, including otter, were carried out between July and November 2023. Habitats recorded during the field surveys and classified in accordance with Fossitt (2000) included Reservoirs (FL7); Exposed Sand, Gravel and Till (ED1); Conifer Plantation (WD4) and Mixed Conifer Woodland (WD3); Mixed broadleaved/conifer woodland WD2; Scrub (WS1); Hedgerows (WL1) and Treelines (WL2); Mixed Broadleaved woodland (WD1); Wet willow-alder-ash woodland (WN6); Depositing lowland rivers (FW2); Reed and large sedge swamps (FS1); Drainage ditches (FW4); Dry calcareous and neutral grassland GS1; Dry meadow and grassy verges (GS2); Wet grassland (GS4); and Marsh (GM1).
- 10.4.17. During the additional mammal surveys, an otter holt was recorded within c. 25m of the proposed route, but it was not possible to determine if it was active at the time of

the survey. The applicant's ecologist considers it likely that otter would hold several territories within the reservoir.

- 10.4.18. Overall, I consider that the level of surveying is appropriate having regard to the biodiversity of the area and adequate in terms of their content, duration and coverage. The baseline information is suitably up to date having regard to the lodgement dates of the planning application.

*Factors that can adversely affect the achievement of conservation objectives*

- 10.4.19. The conservation objectives for the Wicklow Mountains SAC includes the maintenance of the favourable conservation condition of Otter. The favourable conservation status of a species is achieved when its population dynamics data indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats; the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.
- 10.4.20. Wicklow Mountains SAC is located upstream of the proposed scheme and at a substantial hydrological distance. Thus, there is no potential for a pollution event of any magnitude to affect any QI habitats or associated plant species for which the site is designated. However, there are factors arising from the proposed development, in-combination with other plans/ projects, that can adversely affect the achievement of the conservation objectives for the qualifying interest species, Otter, which the Wicklow Mountains SAC is designated. In the absence of mitigation measures, the proposed development alone, and in combination with other plans/ projects, has the potential to adversely affect the maintenance of the favourable conservation condition of this species for which the Wicklow Mountains SAC is designated through potential impairment of water quality, excavation, reduction/ fragmentation of habitat area, and disturbance/ displacement during construction/ operational phases.
- 10.4.21. In an unmanaged situation, impacts could occur from contamination due to dust, increased siltation or deposition in run off from locations of works. There is potential to introduce effects to the hydrological functioning of European Sites, via existing drainage pathways during the construction phase. There are minor watercourses that will be crossed by the greenway that outfall to the greenway. These watercourses and the reservoir shoreline may be used by otter, as otter territories

can be over 13km in length along watercourses and therefore otter will be found both within and outside the Wicklow Mountains SAC.

- 10.4.22. The potential for contamination during the construction phase can be mitigated by a range of measures, best practices, and monitoring. Water quality protection measures will include procedures for control, treatment and disposal of potentially contaminated surface water, management of fuels, and implementation of best practice pollution prevention measures to control risk of pollution to surface waters. This will include adherence to construction and site management practices, silt fencing and catchment ditches, procedures for handling of oils, solvents and paints, use of drainage measures, monitoring of water, and segregation and management of excavated material.
- 10.4.23. During the operation phase of the proposed development, over the edge drainage is proposed for the greenway, where the runoff is collected in a ditch and then discharged into the lake. Channelized flow down the embankment without sufficient protection will be avoided and suitable measures will be put in place to protect from scour. An Emergency Response Plan will also be put in place.
- 10.4.24. Uisce Éireann noted in its initial submission that the assessment on minor watercourses has been carried out in the context of SAC designation and there does not appear to be any consideration of what impact the proposed development will have on water quality. The assessment under Section 11.6.9 above concludes that there may be impacts on water quality in the reservoir through surface water run-off and hydrocarbon pollution, drainage proposals, the lack of toilet facilities, the use of tarmac, dog fouling, the laying of rock armouring and tree felling in proximity to streams, and on this basis, it is recommended that permission should be refused. It is considered that the proposal may affect the treatability of the drinking water source.
- 10.4.25. The mitigation measures may be satisfactory to address some of the construction related impacts on water quality; however, I would have outstanding concerns that the proposed mitigation measures do not fully address the potential for water quality impacts, particularly from the laying of rock armouring, run-off from tarmac, and tree felling close to streams. This in turn, may have significant effects on the prey species of Otter, which is a qualifying interest species for the Wicklow Mountains SAC.

- 10.4.26. In terms of other impacts, construction works could result in disturbance and potentially displacement of otter, particularly if works are undertaken at night. The NIS contains a suite of mitigation measures to minimise disturbance to otter during the construction phase. Works will only take place during daylight hours within 150m of a holt site and under licence or in agreement with the NPWS. Otter activity will be monitored for 6 months prior to works within 150m of a holt and access will be restricted. Excavations will be covered or fenced off to avoid entrapment and any open pipes will be capped. No wheeled or tracked vehicles will be used within 20m of an active, but non-breeding holt. Where the holt is confirmed as a breeding site, no works shall be undertaken within 150m, and works can only be undertaken after cubs have been weaned.
- 10.4.27. The likelihood for disturbance to otter during the operational phase of the proposed development is low. It is noted in the NIS that studies have shown that recreational activity does not significantly impact on otter activity. The greenway is not intended for nighttime use when disturbance to otter would be more likely to occur. There may be some disturbance at dusk as otter is a crepuscular species; however, the existing shoreline is used by hikers so the species would be habituated to a certain level of human disturbance.
- 10.4.28. There may be potential for reduction/ fragmentation of habitat area, for example, through clearance work or the laying of rock armour on the shoreline. Native trees and/ or shrubs will be planted above the rock armour and disturbed soil will be immediately stabilised by reinstating the vegetative layer. Riparian habitat lost or damaged during the construction phase should generally be restored as fully as possible to its state prior to the commencement of works.
- 10.4.29. The targets and attributes for the Special Conservation Interest species that potentially could be adversely affected by the proposed development are set out in Table 3 above. The above mitigation measures will mitigate against some of the potential impacts to otter. However, I am not satisfied that effective measures have been put forward to mitigate the effects on water quality from the proposed scheme, in particular, run-off from tarmac, the laying of rock armouring and tree felling in proximity to streams.
- 10.4.30. In conclusion, I am not satisfied that notwithstanding the implementation of mitigation measures, it can be determined, beyond all reasonable and reliable scientific doubt,



that the proposed development will not result in adverse effects on the integrity of the Wicklow Mountains SAC in view of Otter. The mitigation measures will not address the source of any potential impacts and are not adequate to adequately protect against impairment of water quality.

**Relevant European site: Poulaphouca Reservoir SPA (Site code: 004063)**

- 10.4.31. The site synopsis for the Poulaphouca Reservoir SPA notes that the reservoir covers an area of 20 sq. km and is the largest inland waterbody in the mid-east and south-east regions. The shores of the lake are mostly sandy, and when water levels are low, the exposed lake muds are colonised by an ephemeral flora of annual plant species. Wet grassland areas occur in sheltered bays around the lake but especially in the northern part. It is highlighted that banks are actively eroding in many places, and a strip of conifers has been planted around much of the perimeter of the reservoir in an attempt to stabilise the banks.
- 10.4.32. Poulaphouca Reservoir is of national importance for its Greylag Goose population and is the main roost for the birds, with feeding occurring mostly on improved grassland outside of the site. Lesser Black-backed Gull also roosts at the reservoir in winter and these two species are of special conservation interest for the SPA.

*Baseline Ecological Conditions*

- 10.4.33. Baseline ecological conditions for Poulaphouca Reservoir and the immediately surrounding area are set out above. Field surveys are also described above. The reservoir classification in the NIS states that these types of water bodies have water levels that fluctuate significantly and unnaturally as a result of abstraction, in addition to also containing modified dams, retaining walls or banks. The diversity of floral species within the waterbody itself was low and no fully aquatic plants like pond Lilly or pond weed were recorded. Reed fringes, vegetated sandy shorelines, and wet woodlands were recorded along the shoreline.
- 10.4.34. The SPA is of national importance for the wintering population of Greylag Goose, which is one of the largest in the country. Roosting for this species occurs at Threecastles, in the northern portion of the reservoir. This area is avoided by the proposed greenway route. Greylag geese forage in fields and agricultural areas adjacent to the lake at Threecastles during the day and none of these areas are impacted by the proposed development. Neither of the SCI species breed within the SPA.

- 10.4.35. No species-specific surveys were carried out for Greylag Goose and Lesser black-backed gull. Wintering bird surveys were not deemed necessary as the literature review carried out (e.g. Birdwatch Ireland, iWeBS data) did not identify wintering records of Greylag Goose within the footprint surveyed for the proposed development.
- 10.4.36. The entire route of the 33km proposed greenway is adjacent to the SPA and 1.19km of the existing greenway within the SPA will be widened. Outside of this, a total of 623m of rock armour will be installed for erosion protection within the SPA.

*Factors that can adversely affect the achievement of conservation objectives*

- 10.4.37. The conservation objectives for the Poulavouca Reservoir SPA is *“to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: Greylag Goose and Lesser Black-backed Gull”*. The favourable conservation status of a species is achieved when its population dynamics data indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats; the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.
- 10.4.38. There are factors arising from the proposed development, in-combination with other plans/ projects, that can adversely affect the achievement of the conservation objectives for which the Poulaphouca Reservoir SPA is designated. In the absence of mitigation measures, the proposed development alone, and in combination with other plans/ projects, has the potential to adversely affect the maintenance or restoration of the favourable conservation condition of the bird species for which the Poulaphouca Reservoir SPA is designated through potential impairment of water quality leading to degradation of supporting lake habitat, and through disturbance/ displacement impacts during the construction and operational phases.
- 10.4.39. As with the Wicklow Mountains SAC, impacts on **water quality** within the Poulaphouca Reservoir SPA could occur in an unmanaged situation from contamination due to dust, increased siltation or deposition in run off from locations of works or compound locations. There is potential to introduce effects to the hydrological functioning of European Sites, via existing urban drainage system pathways during the construction phase. Impacts on water quality in the reservoir

may also occur during the operational phase through hydrocarbon pollution, the lack of toilet facilities, the use of tarmac, the laying of rock armouring, and tree felling in proximity to streams. The supporting lake habitat for SCI species could be adversely impacted by deteriorating water quality. The Department also stated that the impact of dog fouling on water quality must be assessed, as well as the loss of floodplain, which naturally attenuates surface water. The applicant submitted that floodplains are outside the works area for the proposed greenway.

- 10.4.40. As noted above, potential for contamination during the construction phase will be mitigated by a range of measures, best practices, and monitoring, which will include adherence to construction and site management practices, silt fencing and catchment ditches, procedures for handling of oils, solvents and paints, use of drainage measures, monitoring of water, segregation and management of excavated material. Operational phase measures will include over the edge drainage, and measures to protect from scour. Notwithstanding this, a similar conclusion can be drawn that the mitigation measures may be satisfactory to address some of the construction related impacts on water quality but do not fully address the potential for water quality impacts, particularly from the laying of rock armouring and tree felling close to streams.
- 10.4.41. The site-specific conservation objectives Poulaphouca Reservoir SPA is to restore the favourable conservation condition of Greylag Goose and to maintain the favourable conservation condition of Lesser black-backed gull. The impact of any significant **disturbance/ displacement** to the wintering population of both SCI species will ultimately affect the achievement of targets for population trend and/ or spatial distribution. Recent data has shown that the Greylag goose population in the SPA has decreased at a rate greater than the national trend. The Ecological Impact Assessment submitted with the planning application states that disturbance potential for birds utilising the reservoir is highest when roosting and foraging areas are affected. Therefore, care should be taken to ensure that all these areas are identified, and disturbance is prevented.
- 10.4.42. The NIS states that foraging for Greylag geese takes place on agricultural lands to the north of the reservoir at Threecastles, and the area of the reservoir used for roosting by this species is to the north of Blessington Bridge. According to the Appropriate Assessment Screening Report, no areas outside the SPA upon which the species are known to use for grazing are due to be impacted by the proposed

development. It is stated that Greylag geese winter at Poulaphouca Reservoir SPA and do not utilise the site for breeding or foraging. Notwithstanding this, the CEMP states that areas identified as grazing/ foraging habitat for Greylag geese will be mapped and recorded by the onsite ecologist and works will be programmed to avoid any unnecessary or avoidable impacts in these areas. The Department submit that this information should be collected in time to inform the Appropriate Assessment by law.

10.4.43. A report titled "Proposal for Monitoring Bird Disturbance at Poulaphouca" was submitted as further information and this document outlines proposals for monitoring greenway usage by the local bird population. It should be noted that the objective is to restore the favourable conservation status of Greylag goose and anything that undermines the attainment of this objective should be considered an adverse effect. I have concerns that the applicant's response to this further information item focuses on monitoring post consent, with little assessment carried out on the potential for disturbance. I consider that more detailed analysis of the potential for disturbance given the sensitivity of the site is necessary. Estimations of areas of high activity, including the potential for disturbance from dogs, on the proposed greenway are not considered, together with the likely concentrations of species that may be disturbed at these locations. Furthermore, third party responses to the applicant's further information submission highlight that the programme of bird monitoring is recommended without any recommendations as to what remedial action would be taken if a negative impact occurred.

10.4.44. Information in relation to the foraging behaviour of Lesser black-backed gull and the potential for disturbance/ displacement is less clear in the NIS. This species also winters at Poulaphouca Reservoir SPA and roosts on the lake at night. It is stated in the NIS that the area of the proposed development does not include feeding or foraging areas for either of the SCI species, and that the greatest use of the greenway will be in summer months when both SCI species are absent from the site. It is also stated that both SCI species roost on the reservoir but feed on agricultural lands to the north of the reservoir during daylight hours, and that areas proposed for work within the SPA are several kilometres to the southwest of the nearest recorded Greylag Goose roost sites. The Department agrees that it is unclear where Lesser black-backed gull roosts or feeds and that further investigation is necessary to

determine this, to assess the impact at all project stages and to provide adequate mitigation, if necessary.

- 10.4.45. The applicant did not carry out any further surveys or investigations of Lesser black-backed gull in the area of the proposed development in the further information response. The further information response states that no significant disturbance impacts from the operational phase are predicted, given the absence of SCI species from the zone of influence of the scheme. However, submissions state that iWebs data shows observations of Lesser Black-backed gull south-west of Baltyboys-Bloshina Bridge to Poulaphouca Dam and Valleymount, which are close to the route of the proposed development.
- 10.4.46. Having regard to the above, there remains uncertainty as to the level of disturbance and displacement of wintering birds in view of the conservation objectives of the Poulaphouca Reservoir SPA and uncertainty as to the effectiveness, sufficiency and clarity of mitigation measures in preventing adverse effects on winter bird distribution within the SPA. It is unclear from the information submitted with the application where Lesser black-backed gull roosts or feeds and if any significant disturbance effects on this species are likely to occur at the construction and operational stages of the proposed development. Furthermore, in the absence of species-specific surveys, it is unclear if any disturbance impacts on roosting or foraging Greylag goose will occur at any stage of the proposed development. Proposals for post construction monitoring cannot be relied upon to identify any residual adverse effects and then to apply additional measures. There is also uncertainty that mitigation measures do not fully address the potential for water quality impacts, particularly from the laying of rock armouring, run-off from tarmac, dog fouling and tree felling close to streams. This could result in degradation of lake habitat that support SCI species.

## **10.5. In-Combination Effects**

- 10.5.1. The applicant carried out a desktop planning application search and concluded that most planning applications in proximity to the proposed development relate to small-scale residential developments, amendments and extensions. Reference is made to a solar farm application (Reg. Ref: 17/908) as amended by Reg. Ref: 21/237. However, the proposed solar farm would be located in Threecastles approximately 2.4km north-east of the closest part of the proposed greenway at Blessington Bridge.

I agree that no cumulative or in-combination impacts with this application may reasonably be considered likely given this separation distance. There were no other projects or plans known to the authors of the applicant's Appropriate Assessment Screening Report and NIS that would cumulatively or in combination with the proposed works have significant impacts on the Poulaphouca Reservoir SPA.

- 10.5.2. Following the request for further information, the applicant assessed the cumulation of impacts on the existing 6km section of greenway on the western side of the reservoir. It was concluded that SCI species do not occur within this area and therefore no potential for impacts on these species is likely. The existing greenway path will be upgraded at this location where a 1.19km section continues through the SPA. There is potential for impacts at this location from changes to surface water quality arising from construction works.
- 10.5.3. There is potential for in-combination impacts with existing plans pertaining to the local area, county and region. As part of the NIS, the Wicklow County Development Plan 2022-2028, the County Heritage Plan (2017-2022) and the Regional Spatial and Economic Strategy (RSES) were reviewed for in combination impacts. As noted in Section 5 above, it is a policy of the Wicklow County Development Plan (CPO 11.36), to *"support and facilitate the delivery of the Blessington Greenway and the South Wicklow Greenway Arklow to Shillelagh including facilities ancillary to these routes (such as sign posting, car parks) and the development of linkages between these trails and other local routes."* The RSES also recognises the opportunity to develop a number of flagship greenways in the region including the Blessington Greenway – approved extension around Blessington Lake, taking in the surrounding villages of Lackan and Ballyknockan, which offers the potential to attract people to work and visit the area and surrounding villages.
- 10.5.4. A number of other individual projects/ developments in the immediate vicinity of the proposed scheme are also planned. These are listed under planning history in Section 4 above and I have considered these for the purposes of in-combination assessment. In particular, I note the proposal for a high-performance training centre to include a single storey boathouse (1,598 sq.m.) with eleven bays for rowing boats, a two-storey attached ancillary building (729 sqm), and a housing launch boat area, with 8 bays for safety boats located at Burgage Moyle, off the R758 to the south of Blessington (ABP-302615-18). A decision to grant permission on this case was quashed; however, the case has now been reactivated under Ref: ABP-314020-22.

A NIS has been submitted with this case, but no decision has been made at the time of writing. In combination effects will be considered by the Board in the assessment of this case and the proposal must comply with all relevant planning and environmental approval requirements.

- 10.5.5. I note the issue with the decision that was quashed related to whether there would be increased activity arising from the rowing facility and the usage of the site after dark. The proposed greenway facility will clearly result in an increase in activity around the shores of Poulaphouca Reservoir. As noted in the NIS, *“at an operational stage the Greenway is likely to be busier during daylight hours but is not intended for night time use.”* However, I would be concerned that there is potential for the greenway to act in-combination with the rowing facility by increasing activity around the shores of the lake when SCI bird species are roosting on the lake at dawn and periods leading up to dusk. There may also be potential for increased in-combination daytime activity with the rowing centre and the greenway, and as outlined above, there is insufficient evidence available to me to determine if SCI bird species utilise this part of the lake or adjoining lands for feeding or foraging.
- 10.5.6. Considering that it has not been adequately demonstrated in planning application documentation, including the Appropriate Assessment Screening and NIS, that the proposed scheme alone will not adversely affect the integrity of any European sites, I am not satisfied that other plans and projects will not act in combination with the proposed scheme to have an adverse effect on the integrity of any European sites.
- 10.5.7. In light of objective scientific information, and notwithstanding the proposed mitigation measures, I consider it has not been adequately demonstrated, that the project, either individually or in combination with other plans and projects, will not have an adverse effect on the integrity of the Poulaphouca Reservoir SPA, in view of its conservation objectives and in view of best scientific knowledge. Based on my analysis of the NIS, the NPWS data and scientific evidence provided, adverse effects to the integrity of the European sites within the Zol of the proposed scheme and the potential for in-combination effects with other projects and activities were not excluded based on the following:
- The potential for adverse effects cannot be effectively and sufficiently ameliorated by both design-based and applied mitigation measures related to surface water quality and disturbance/ displacement impacts.

- The proposed scheme itself will lead to adverse impacts on the Qualifying Interests/ Special Conservation Interest species of the European sites within the ZOI of the proposed scheme.
- Other plans/ projects, including those in the immediate vicinity of the proposed scheme, have been considered in the context of in combination effects and must comply with all applicable planning and environmental approval requirements and be in accordance with the environmental protection objectives and policies of the relevant land use plans. However, there is insufficient information available to determine what parts of the lake and adjoining lands are of importance to SCI bird species for feeding or foraging and if the proposal would act in combination with other planned or ongoing projects to have adverse effects on the integrity of a European site.

#### **10.6. Appropriate Assessment Conclusions**

- 10.6.1. Having carried out screening for appropriate assessment of the proposed Blessington greenway, it was concluded that these works would be likely to have a significant effect on the Wicklow Mountains SAC and the Poulaphouca Reservoir SPA. Consequently, an appropriate assessment was required of the implications of the project on the qualifying features of this site in light of its conservation objectives.
- 10.6.2. Following an examination and evaluation of the NIS, updated NIS and all associated material submitted as part of a request for further information, and taking into account submissions of the Department of Housing, Local Government and Heritage, Uisce Éireann, Dublin City Council Water Services and the public, my findings are that the scientific information before the Board is not adequate for complete, precise and definitive conclusions to be made which are capable of removing all reasonable scientific doubt as to adverse effects of the proposed Blessington Greenway on the integrity of the Wicklow Mountains SAC and the Poulaphouca Reservoir SPA in view of the conservation objectives of these sites.
- 10.6.3. This conclusion is based on:
- A full and detailed assessment of the construction and operational impacts of the proposed development on water quality potentially leading to a deterioration of the supporting ecological requirements in an ex-situ capacity for Otter, which is a qualifying interest species for the Wicklow Mountains SAC. This would



undermine the attainment of the conservation objectives for this species, which is to maintain its favourable conservation condition, through potential deterioration of freshwater habitat and available fish biomass.

- A full and detailed assessment of the construction and operational impacts of the proposed development on water quality leading to degradation of supporting lake habitat for Greylag goose and Lesser black-backed gull, which are qualifying interest species for the Poulaphouca Reservoir SPA. This would undermine the attainment of the conservation objectives for Greylag goose, which is to restore its favourable conservation condition, and for Lesser black-backed gull, which is to maintain its favourable conservation condition. Adverse effects on site integrity cannot therefore be excluded.
- Uncertainty as to the disturbance and displacement impacts on wintering birds on the Poulaphouca Reservoir SPA in combination with other plans and projects. This would undermine the attainment of the conservation objectives for Greylag goose, which is to restore its favourable conservation condition, and for Lesser black-backed gull, which is to maintain its favourable conservation condition, through potential disturbance to the wintering populations ultimately affecting the achievement of targets for population trend and/or spatial distribution.
- Reliance on post consent monitoring to identify any further adverse effect is not in line with the obligations of Article 6(3) of the Habitats Directive. This would undermine the attainment of the conservation objectives for Greylag goose, which is to restore its favourable conservation condition, and for Lesser black-backed gull, which is to maintain its favourable conservation condition.

## 11.0 Recommendation

On the basis of the above assessment, I recommend that the Board **refuse** to approve the proposed development subject to the reasons and considerations below.

### Reasons and Considerations

1. In coming to its decision, the Board considered the following:
  - (a) the EU Habitats Directive (92/43/EEC),

- (b) the European Union (Birds and Natural Habitats) Regulations 2011-2015,
- (c) the Water Framework Directive (2000/60/EC),
- (d) the Climate Action Plan, 2024
- (e) the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on a European Site,
- (f) the conservation objectives, qualifying interests and special conservation interests for the Wicklow Mountains SAC (site code: 002122) and the Poulaphouca Reservoir SPA (site code: 004063),
- (g) the policies and objectives of the Wicklow County Development Plan, 2022-2028,
- (h) the nature and extent of the proposed works as set out in the application for approval,
- (i) the information submitted in relation to the potential impacts on habitats, flora and fauna, including the Natura Impact Statement,
- (j) the submissions and observations received in relation to the proposed development,
- (k) the report and recommendation of the person appointed by the Board to make a report and recommendation on the matter,

#### **Appropriate Assessment – Stage 1:**

The Board agreed with and adopted the screening assessment and conclusion carried out in the Inspector's report that the Wicklow Mountains SAC (site code: 002122) and the Poulaphouca Reservoir SPA (site code: 004063), are the only European Sites for which the proposed development has the potential to have a significant effect.

#### **Appropriate Assessment – Stage 2:**

The Board considered the Natura Impact Statement and associated documentation submitted with the application for approval, including further information submitted, the mitigation measures contained therein, the submissions and observations on file, and the Inspector's Report.

The Board completed an Appropriate Assessment of the implications of the proposed development for the affected European Sites, namely, the Wicklow Mountains SAC (site code: 002122) and the Poulaphouca Reservoir SPA (site code: 004063) in view of the sites' conservation objectives.

In completing the Appropriate Assessment, the Board considered, in particular the following:

- i. the likely direct and indirect impacts arising from the proposal both individually or in combination with other plans or projects,
- ii. the mitigation measures which are included as part of the current proposal, and
- iii. the Conservation Objectives for the European Sites,

The Board completed and adopted the screening and the Appropriate Assessment carried out by the Inspector as set out in the Inspector's Report in respect of the potential effects of the proposed development on the integrity of the aforementioned European Sites, having regard to the sites' conservation objectives.

The Board is not satisfied that the Local Authority has demonstrated beyond reasonable scientific doubt that the proposed development would not adversely affect the integrity of the Wicklow Mountains SAC (site code: 002122) and the Poulaphouca Reservoir SPA (site code: 004063), in view of the Conservation Objectives of these sites.

In the absence of detailed information on the impact of the proposed development on water quality within watercourses leading to the reservoir and the reservoir itself, the Board cannot rule out the possibility of adverse effects on the integrity of the Wicklow Mountains SAC and the Poulaphouca Reservoir SPA having regard to the reliance of SCI species on the water environment.

The Board is not satisfied that adverse disturbance and displacement impacts on foraging and roosting SCI bird species will be adequately mitigated having regard to the increased presence of pedestrians and cyclists associated with the proposed greenway, and the uncertainty as to the usage of the site and surrounding area by SCI bird species. The Board can place no reliance on post

consent monitoring to identify any further adverse effect or apply additional mitigation measures.

In overall conclusion, the Board is not satisfied that the proposed development would not adversely affect the integrity of the European Sites in view of the sites' conservation objectives.

**Proper Planning and Sustainable Development/Likely effects on the environment:**

2. The site of the proposed development is located around the shoreline of Poulaphouca Reservoir, which is one of two major sources of water supply for the Greater Dublin Area. The protection of the reservoir as a drinking water source is of national importance. Having regard to the sensitivity of the reservoir, and the proximity of the proposed greenway, the Board is not satisfied, on the basis of the information submitted with the planning application, that the proposed development will not adversely affect the treatability of the drinking water source and has also failed to adequately demonstrate that the proposed development would not give rise to a potential deterioration of the Water Framework Directive status of the adjoining waterbody. The proposed development would, therefore, give rise to a potential source of water pollution, would be prejudicial to public health and be contrary to the proper planning and sustainable development of the area.

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Donal Donnelly  
Senior Planning Inspector

31<sup>st</sup> October 2024

## 12.0 Appendix 1 – Summary of Third Party Submissions

12.1.1. A total of 290 public submissions were received by the Board on the application.

The main points raised in these submissions, avoiding repetition where possible, are summarised as follows:

Aileen Duffy, Knockieran

- Strongly in favour of proposed greenway as it will bring life to Blessington and surrounding communities.
- Greenway will help to establish the area as a tourist spot.
- Inclusion of car charging infrastructure is welcomed but “e” should not be included in the name of the greenway.
- There is no provision for toilets at any point along the route. Consideration should be given to power and waste connections at key locations.
- Emergency services could be facilitated on the shared space area of the bridge crossing.
- Shared path through Blessington will bring cyclists, pedestrians, greenway users and residents into conflict, e.g. junction of Kilbride Road and Main Street.
- Removal of parking along Main Street is welcome; similar could have been done along Kilbride Road.
- Should be clear that pedestrians and cyclists have priority at junctions in Blessington and across minor roads.

Aine & Seamus Nolan, Ballyknockan

- Object to the traffic lights and single lane proposal – would be in favour if original proposal of cantilever bridges or alternative bridge solution was proposed.
- Traffic in Blessington/ Lacken/ Vallymount/ Ballyknockan has increased substantially over the last 10 years – right infrastructure needs to be in place to support such an ambitious plan.

Aine Ascough, Sroughan

- In favour of well-planned greenway in principle.
- Lack of consultation with local residents and landowners.
- Downgrading of 3 no. lake bridges to single lane traffic plus toucan crossing – traffic calculations to justify the suitability of these bridges was carried out in May 2021 during lockdown. Proposal will lead to tailbacks.
- None of the car parks will have toilets contrary to Guidelines for Greenways and Cycle Routes Ancillary Infrastructure. There will be litter, health and sewage issues next to Dublin city water supply.
- Environmental risks of removing more than 7,000 trees and large amounts of rock armour have not been properly dealt with – project should be subjected to full EIA.
- No proposals to upgrade existing ESB fencing – should be dog proof and should not invite trespassing.
- Inadequate consideration to long-term safety, security and management of proposed greenway.
- Concerned at loss of car parking in Blessington, particularly disabled, ambulance and doctor's spaces.

Aine Butler, Lockstown

- In favour of greenway but opposes plans for traffic lights on bridges.

Aine Shirran and Teresa Shirran, Butter Hill

- Objects to traffic lights and one-way system on bridges that would restrict farm machinery.

Aisling Giltrap Mills, Glashina

- Owns lands adjoining Russeltown to Vallymount Road and have issues with dogs.
- Good idea in principle but there are outstanding issues (as above).

Alan Cowie, Sandyknowe

- Supports greenway concept as a wonderful amenity.
- Objects to restriction of traffic flow over bridge as above.
- Greenway could be routed by boardwalks under ends of bridges and on lake shores.

Alan Jordan, Centra Caragh

- Objects to the proposed cycle lane in Blessington town for the greenway.
- There will be difficulties with deliveries to Centra shop.
- Customers will be left with no parking on this side of the street, which will impact on business.

Alison Bailey, Humphrystown House

- Objects to traffic lights on bridges.

Amy Hughes, Baltyboys

- Additional traffic levels on Baltyboys to Tulfarris Road.
- In favour of greenway but current walking route and traffic lights on bridges are unacceptable.

Andrea and Raymond Horan, Baltyboys

- Welcomes the greenway extension due to local employment and economic benefits; visitors to the area, county and country; and its amenity and tourism contribution.

Ann Dalton, Windfield House

- Observer is a farmer and landowner adjacent to the proposed greenway.
- Greenway will be a great benefit to many, such as recreational outlets, business opportunities and tourism.
- Objects to lane reduction and traffic lights on bridges.
- Proposed additional car parking is inadequate.
- Observer proposes 2m fencing along their boundary and greenway – should be maintained by greenway development committee.

- Wildlife study failed to take into consideration the disturbance and destruction of existing habitat due to felling, excavation and migration.
- Further archaeological study should be carried out – site on public record have been ignored.

Ann Horan, Deerpark Green

- Area will be enhanced by the greenway and single landowner will help.

Ann Mooney, Baltyboys

- No input from local councillors which in turn has taken away any representation from the local community.
- Proposed lane width of 3.25m will only facilitate a car passing through.
- No details of tree planting programme to replace removed trees.
- Intensity of construction traffic will be extremely disturbing to the local community.
- Proposed greenway will cause a huge threat to two bird species protected under European law.
- More suitable application should be proposed that will not have a huge impact on daily lives and the surrounding community.

Ann O'Sullivan, Woodend, Naas

- NPWS has not yet produced Site Specific Conservation Objectives for Poulaphouca Reservoir SPA. Not possible for the Board to carry out Appropriate Assessment.
- EIAR required for the proposed development – proposal will have a significant adverse effect on the environment.
- Significant effects on bats are likely based on the Ecological Impact Assessment. EcIA is inadequate in terms of surveying and methodology.
- Board is required to direct the preparation of an EIAR pursuant to Section 50 (1)(d) of the Roads Act, 1993. Section 177AE not the correct procedure.

Ann & Frank Hanlon, Blessington Orchard



- Present application should be rejected by the Board and returned to Wicklow County Council to be applied for with opportunity for full due process being afforded to the public.
- WCC should look at the feasibility of a pontoon bridge and gangways combination to create a 2-way cycle lane parallel with each bridge.

Ann-Marie Morrissey, Ballylow

- Points of objection raised above – hopes for a better and more realistic solution if the greenway is to go ahead.

Anthony Jones & Others, The Clay

- The following observations are made in support of the application:
  - Connectivity – opportunity should be explored to improve/ create stronger link between Blessington town and reservoir.
  - Potential to introduce a new path from the back of the old health centre to connect to the existing path at the Avon.
  - Considerable section of the lake perimeter between Russborough House and Tulfarris Hotel and Golf Course and onto Baltyboys bridge has been left out of the greenway route – considered missed opportunity to provide a feature pedestrian bridge at Poulaphouca dam gorge.
  - Larger car parks will be needed along with a visitor centre and open and roofed seating at scenic spots.
  - Proposed tarmac paths are in conflict with this 'Area of Outstanding Natural Beauty' – softer surface of compacted stone would be more appropriate.
  - Propose installation of side mounted pedestrian boardwalks on bridges along with traffic calming and bridge uplighting.
  - Plan should be put in place for introduction of self-drive and operated cruises – should include business/ installation plan for docks.

Aoife Brennan, Downshire Park

- Expresses unconditional support for the proposed greenway extension.

- Flora and fauna have been thriving where non-native trees were felled at Russelstown.
- Current greenway gates at Valkeymount Road and Burgage are not negotiable or people using mobility vehicles.

Arleen Rohl, Blackditches Lower

- In favour of greenway if done properly but expresses similar concerns as outlined above.

Assumpta Byrne, Mamor Kilbride

- Recognises that greenway is of social benefit but objects for similar reasons outlined above.

Austin Tisdall, Manor Kilbride

- Conditionally in favour of the proposal but objects to traffic lights and single lanes on bridges, in particular Knockieran bridge which has four roads leading to it.

Barry Kinane, Carrigacurra

- Proposal will further gentrify the area and bring criminality.

Barry Murphy, Ballinascullogue

- Objects to traffic lights.

Barry Murphy, Lacken

- In favour of greenway but not to traffic lights on bridges.

Bernadette Boylan, Baltyboys

- Objects for same reasons outlined above.
- Greenway should not be moved onto public roads at Baltyboys house.
- Proposal in result in an invasion of peoples' privacy.
- Would be in favour if planned in conjunction with residents and landowners.

Bernadette Hennessy, The Office Shop

- Removal of parking will affect business on Main Street.

Bernadette Moran, Britonstown

- Objects to one-way system/ traffic lights.

Beryl Furlong, Rathnabo

- In favour of greenway but objects to traffic lights and single lane proposal.
- No future increase factored into traffic figures for proposal that will attract upwards of 330,000 visitors per year.
- Potential for contamination of drinking water from laying of asphalt/ tarmacadam for surface of greenway.

Blessington & District Forum, c/o Glending Road

- Recognises the significant strategic importance of the greenway but unhappy with the aspects outlined above.
- Replacement trees should commence with immediate effect.
- Agreed percentage of replacement trees should be of a more mature size.
- Community tree planting days should be organised.
- Large native species such as oak should remain, and path should be rerouted.
- Ecologist should remain engaged throughout the project.
- RRDF funding would enable the complete refurbishment and modernisation of Blessington Main Street with possible partial pedestrianisation – civil works would need to be reworked.
- Consideration should be given to lighting to ensure minimal disruption to residents and wildlife.
- Requests oral hearing to clarify views.

Blessington Tourist Office, Newtown Square

- Supports the greenway and highlights benefits for tourism and access to historic sites.
- Greenway will enhance usage of other all year round attractions.

- Economic benefits by supporting existing businesses and offering new opportunities.
- Greenway will encourage exercise and healthy and active living.
- Conservation, protection and education will benefit from this safe and protected environment.
- Proposal will highlight local environment, cultural awareness and community identity.

Breda & Michael Waldron, Carrig

- Objects to traffic lights and one lane system for bridges.

Bonfield family, Humphreystown

- Objects to traffic lights and one lane system for bridges.

Brenda Hand, Carrig

- Objects to traffic lights and one lane system for bridges.

Brendan Hughes, Baltyboys

- In favour of greenway but opposes current walking route and traffic lights on bridges.

Brendan McGarr, Kilmalum

- Supports greenway in principle but has concerns as raised above.

Brian Miley, Baltyboys

- L8360 is not wide enough for 2-way traffic and volume of people walking.
- Objects to traffic lights.

Brian O'Sullivan, Manor Kilbride

- Objects to traffic lights and one lane system for bridges.

Bridget Farrington, Ballyknockan

- Welcomes greenway and leisure facilities that derives from it but has similar concerns to those raised above.

Bridie McDonnell, Granabeg

- Objects to traffic lights and one way system as above.
- Original idea of 1m wide path was sufficient and no trees needed to be removed.

Caitriona Kelly, Knockieran

- Objects to traffic lights and one way system as above.

Carl Smith, Rathnabo

- Objects as above.

FP Logue Solicitors on behalf of Carmel Ascough, Sroughan

- Plans and particulars provide virtually no detail on what is to be constructed.
- Lack of serious traffic and transport assessment is a serious omission.
- Application is non-compliant with Regulation 249(a) of the Planning and Development Regulations, 2001 and should be returned as invalid.
- Application should be returned to Wicklow County Council and full public consultation should be carried out.
- At least a 10-year maintenance/ management budget should be ringfenced as a condition of development consent.
- Observer's right of way to water's edge is not shown on planning application drawings.
- Observer wishes to engage in the design development of an acceptable gated crossing point to accommodate boat and boat trailer.
- All watercourses on observer's land should be recorded and provided with suitable drainage pipework into the lake – only one of three watercourses has been identified on planning application drawings.
- If planned, implemented and managed well, greenway has potential to be an excellent amenity.

Catherine and John Craul, Oldcourt

- Objects to traffic light and one way system.

Catherine & Michael Kehoe, Burgage More

- In favour of developing the greenway but objects as above.
- No plan to include parking in the area of Burgage More.

Catherine Keogh, Ballyknockan

- Objects as above.
- Project Liaison Officer should be appointed to engage with landowners and communities.
- Surfacing of local roads should be improved before influx of traffic comes into the area.
- Not enough surveys have been carried out and access for emergency services hasn't been given due diligence and attention.

Catherine O'Toole, Lacken

- Conditionally in favour of greenway and fully supports recommendations set out in Ecological Impact Assessment.
- All mature trees should be maintained and any replacement should take place in next available planting season.
- Hard packed dirt paths or boardwalks are preferable to tarmac.
- In favour of no lighting being used along the greenway but any installed lighting should prevent light spill and be amber in colour.
- All work should be carried out with consideration given to surrounding wildlife and habitats.

Catherine Roche, Manor Kilbride

- Objects to one-way bridges and impact on emergency vehicles and farm vehicles.

Caitriona Byrne, Millbank

- Has office and pays for parking in car park beside greenway at Kilbride Road – wants assurances that spaces will be allocated to clients/ staff.
- Parking will be removed outside office and there are no plans to expand current car park – many of observer's clients are elderly.

- Cycle lane plan does not indicate whether parking will be restricted on the other side of the street.
- Removal of traffic lane on Kilbride Road will cause delays.
- Width of footpath should not be compromised and there should be separation from cycle lanes.
- Greenway will be of benefit to the community but there has not been sufficient consultation with all affected parties.

Christopher Darby, Lemonstown

- Does not object to the greenway per se but insufficient care is being taken to identify and preserve local archaeological heritage.
- Observer has made a number of important archaeological finds on the foreshore at Baltyboys.
- Further artifacts will almost certainly lie in the path of the proposed new greenway and no mitigation or archaeological supervision is intended.

Ciara Stewart, Baltyboys Upper

- Objects to certain aspects of the greenway.
- Route chosen for the connecting part that links Tulfarris to the main greenway is not suitable for children, casual cyclists and walkers. Greenway should be kept to the lakeside.
- Designated bathing spots should developed on the lake.
- Proposed traffic lights will cause environmental problems with idling tractors, cars and trucks.

Ciaran Duffy, Knockieran Lower

- Strongly in favour of the proposed greenway but there are opportunities where it can be enhanced (as above).
- Reduction in traffic on bridges may extend their service life.
- Speed limit in Blessington should be reduced to 30kph.

Ciara Miley, Boystown

- Greenway will run through observer's farm and she has not been contacted.
- Observer will need to pass the greenway four times a day with livestock and this will prove hazardous.
- Traffic lights will have a huge impact on daily farming duties.

Claire O'Driscoll Lawrie, Ballyknockan

- Objects to traffic lights and one way system on bridges.

Claire Boylan, Baltyboys

- Objects to greenway for reasons outlined above.

Claudine Cahill, Blackditches

- Local residents are all for welcoming extra visitors but is concerned with the proposed traffic light system on bridges.
- Inadequate lighting, seating and CCTV around the proposed greenway.

Cllr. Avril Cronin, Dunlavin

- Proposal would increase tourism, boost the local economy and provide a safe place for locals to cycle and walk.
- Similar concerns to those raised above relating to the bridges, parking, toilets and fencing.

Cllr. Joe Behan, Bray

- Objects to traffic light controls, removal of parking and lack of prior consultation.
- Requests an oral hearing.

Cllr. John Mullen, Tinahely

- Commends this community-based project as a gamechanger for the sustainable management of tourism in Wicklow.
- Some elements of the current design lack adequate public consultation (as above).



- Changes can be made to the traffic management of the bridges by way of condition attached to any planning approval
- Requests an oral hearing.

Cllr. Edward Timmins, Grangecon

- Disagrees with traffic lights on bridges, loss of parking and greenway on public roads.

Colman Curtin, Ballyknockan

- Welcomes the greenway but has similar objections to the above (parking, toilets, bridges).

Connel McGuire, Blessington Lake Boat Hire, Ballyknockan

- Greenway will encroach 5m into their usable operable space. Observer wishes to see their usable space extended into the trees for storing boats and trailers and this area to be fenced off. Storage, gates and jetty also required.

Conor Harpur, Baltyboys

- Does not oppose the greenway but route on public road and traffic lights are unacceptable.

Cllr. Gerry O'Neill, Butterhill Lane

- Inadequate parking, consultation, toilets and bridge arrangements.

Cllr. Patsy Glennon, Hollywood

- Supports the establishment of a properly planned greenway.
- Has concerns as above relating to the bridges and deficiency in car parking facilities.

Damien Farrington, Hollywood

- In favour of well-planned greenway but objects to bridge proposals and loss of car parking.

Daniel Murphy, Manor Kilbride

- Objects to proposed reduction of bridge at Knockieran due to need to cross with livestock haulage equipment, contractor machinery for crop harvesting and delivery of animal feed. Restriction on bridge would increase journey by 23.6km.

Darragh Flynn, Lacken

- Welcomes well thought out greenway but has similar concerns to those raised above.
- 3.7m from kerb to kerb required to accommodate modern fire engines – laneway on bridges to be reduced to 3.25m.
- White-clawed crayfish not referred to in Ecological Impact Assessment.

Darren Crowe, Haywood

- In favour of greenway as it will be a fantastic resource for Blessington and its residents.

Dave Ryall, Baltyboys

- Objects to traffic lights on bridges.

David Boud, Humphreystown

- Objects for similar reasons outlined above.

Davy Ryan, Baltyboys

- Proposal is quite different to earlier proposal – local residents will be most heavily impacted for similar reasons outlined above.
- Supports greenway but application is unacceptable to observer.

Declan Faughy, Ballyknockan

- Objects for similar reasons outlined above.

Declan Gilheany, Knockieran

- Objects for similar reasons outlined above.

Deirdre Byrne & Michael Hanley, Burgage Mor

- Objects for similar reasons outlined above.

Denis Halpin, IFA Commodity Chair, Valleymount

- Objects for similar reasons outlined above.
- Garda District Superintendent was not consulted with regards to policing, traffic management or user safety.

Derek Larney, Tulfarris Holiday Village

- Supports greenway as a way to provide excellent leisure amenity and to bring tourism and new business to the town.
- Objects to traffic lights for above reasons and on visual grounds.
- Speed humps could be installed on the bridge to slow traffic to under 30kph.
- Tulfarris spur includes a very steep hill which has a gradient outside the parameters for cycleways as advised by TII. There is also a bad sight line at the dog-leg corner. Suggests alternative route via Blessington Sailing Club.

Diana Gallagher, Lacken

- Objects for reasons relating to lack of consultation, traffic lights on bridges (inaccurate measurements), car parking, toilets, littering, etc.
- In favour of a well-planned greenway in principle.

Don O'Sullivan, Ballyknockan

- Objects to the planning application.

Doro Kolmans, Kilbride

- In favour of greenway but objects to the one-way systems on bridges.

Edel Kelly, Ballyknockan

- In favour of greenway in principle but objects for similar reasons to the above relating to bridge proposals and traffic concerns, effects on area of outstanding natural beauty, drawing clarity, public toilets, etc.
- Use of rock armour should be minimised as much as possible.

- Lack of dimensions, spot levels and general notes on application drawings.
- Board should examine the greenway at Vartry Reservoir with respect to toilet facilities in Roundwood and path surfacing.

Edel Zeller, Lacken

- Objects to proposed traffic light system for bridges.

Edward Miley, Boystown

- Greenway will run through the middle of observer's farm – will need to pass this road several times a day with livestock and this will prove hazardous. Road is narrow and to add walkers is a concern.
- Traffic lights will have a huge impact on daily farming duties.
- On-road section (L8360) is significantly steep and is unsafe for use as a greenway. Road to Tulfarris is also inappropriate for a greenway.
- Concept of lakeside greenway is otherwise sound.

Eileen Murphy, Westpark

- In favour of greenway but objects to elements as highlighted above.

Eimear Deegan, Ballymore-Eustace

- Supports the greenway and submits that it will open up access to the lake shore, particularly for those with reduced mobility.
- Welcomes plans to replace largely commercial trees with native species.
- Connection to existing tunnel/N81 underpass at Russborough House is a key safety enhancement to the existing trail and CCTV and bins at car parks are also welcome features.
- Plan could benefit from more public toilets and proposed lights could prove problematic.

Elizabeth Finlay, Burgage More

- Objects specifically to the proposed bridge traffic lights.

Elizabeth Hayes, Burgage Manor

- Objects to traffic lights and requests adequate parking, litter collection, dog excrement containers, etc.

Elizabeth Miley

- Greenway will bring positives to the area but objects to use of L8360, dogs and traffic lights.

Ellen Balfe

- In favour of greenway but objects to traffic lights.

Ethan Cotter

- Objects to traffic lights.

Evelyn Pender, Baltyboys

- Objects to proposal for reasons relating to traffic lights and parking.

Feargal O'Neill, Lacken

- Supportive of the concept but objects for similar reasons to the above.

Fiona Duffy, Knockieran

- Supports greenway – traffic lights at bridges are a small price to pay.
- Proposal will provide for sustainable transport which will help to reduce carbon footprint for short journeys.
- Provision of toilet facilities along the route would be a significant addition.

Frank D'Arcy, Knockieran Lower

- Supports greenway but raises a number of concerns relating to new buildings at Knockieran car park, omissions from drawings at Knockieran car park, insufficiency of car parking at Knockieran, litter and maintenance, toilets and Knockieran Bridge.

Frank Kavanagh, Baltyboys

- Objects to traffic lights.

Gary Finlay, Burgage More

- Objects to traffic lights.

Gary Hanlon, Knockieran Lower

- Objects to traffic lights.

Gary Stewart, Baltyboys Upper

- Proposal will bring positives to the area in relation to tourism and physical activity; however, observer has concerns regarding the sharing of the L8360, traffic lights on Baltyboys and Valleymount bridges and lack of consultation.

George O'Callaghan, Lacken

- Water route around the 26km Rutland Park in England has 6 toilets.
- Absence of toilet facilities effectively rules out the use of the greenway by the disabled and elderly.

Ger Kelly, Ballyknockan

- In favour of greenway but sets out a number of issues as above.

Geraldine Hanlon

- Objects to traffic light system.

Grace O'Neill, Baltyboys

- Objects to use of L8360 and traffic light system.

Harry Farrington, Ballyknockan

- In favour of greenway but opposed to bridge traffic light system and for other reasons as above.

Helen Murphy, Burgage More

- Supports greenway but opposes certain aspects as above.
- Route from Avon to Knockieran bridge needs a better solution – should be put along lakeside.

Henry ward Jnr., Ballyknockan

- In favour of greenway but objects for similar reasons to those outlined above.

Hilary & Michael Miley, Humphreystown

- Objects to traffic lights at bridges.

Hilary Sherlock, Knockieran

- Objects for similar reasons to above.
- Objects to proposal to construct an underpass at Knockieran as it would attract anti-social activity.
- Proposal would turn greenway into primarily a cycleway.
- 2m wide stone surfaced walkway is needed instead.

Howard Dalzell, Manor Kilbride

- Opposed to traffic lights

Jack & Mary Nolan, Woodend

- Objects for similar reasons to above.
- Laying of 128,000m<sup>3</sup> of asphalt/ tarmac will lead to considerable pollution of the reservoir. Pollutants leach into the ground and subsequently into the reservoir given the path's proximity.

Jacqueline Tyrrell, Lacken

- Welcomes greenway but raises similar issues to the above.
- Requested to look at the feasibility of a central car park on the N81 and the suitability of shuttle transport to the various key locations around the greenway.
- No structural assessment of the bridges has been provided to ensure they can support the level of anticipated traffic.

James O'Reilly, Baltyboys Upper

- Object to use of road to Tulfarris.

James McDonnell, Vallymount

- Objects to closure of one lane on bridges.
- Proposed development will up to 10,000 truck movements and roads around the lake may not be capable of handling this extra traffic.
- No septic tank within 200m of lake shore or 100m of feeder stream is permitted.

- Original greenway idea of a 1m wide path was sufficient.

James, Bridie, Paul & Niamh Carroll, Blackrock

- In favour of greenway but object to traffic lights.

Jamie Miley, Baltyboys

- Objects to use of L8360 and proposed traffic lights.

Jane & Colin Byrne, Lacken

- In favour of well-planned greenway but objects for reasons outlined above.
- Shell evidence of freshwater pearl mussel and claws of freshwater crayfish are common along the shoreline at Ballinastockan.
- Bat species and mammals inhabiting the area are protected species.
- Questions if full EIAR is needed for the greenway.

Jane Boylan, Baltyboys

- Objects for reasons outlined above.
- Privacy concerns with greenway passing to front.

Jean Duffy, Manor Kilbride

- Objects to proposed bridge traffic lights.

Jeanette O'Toole, Lacken

- Broadly welcomes the proposed greenway and is happy such a detailed EcIA was carried out.
- On site ecologist and arborist should be employed to monitor construction work.
- Native mature trees should be saved where possible.

Jenise O'Brien, Baltyboys Lower

- No need for traffic lights on bridges and proposal for promised new cantilever bridges should be reinstated.

Jennifer Dunne, Ballyknockan



- Not against the greenway if done properly but objects for reasons outlined above.

Jennifer Ennis, Ballinstockan

- Supports the greenway project and the healthy alternative way of getting to Blessington.
- A right of way system might work better on the bridges.

Jim Phibbs, Burgage More

- In favour of greenway but objects to traffic lights and one way system.

Jim Schofield, Burgage More

- Excellent concept in principle but objects to traffic lights and lack of toilets.

Jim Woods, Ballyknockan

- Objects to traffic lights.

Joanne Butler, Lockstown

- Objects to traffic lights.

Johanna Kelly & Kevin Osbourne, Lockstown Lower

- Supports greenway but objects to traffic lights.

John & Eithne O’Riordan, Manor Kilbride

- Objects to traffic lights.

John Brady TD, Bray

- Supports greenway but objects to traffic lights and lack of consultation.

John Brennan, Valleymount

- Objects to proposed works at Baltyboys and Humphreystown bridges.

John Crimin, Crimin Butchers, Blessington

- Objects to cycle lane in Blessington town for reasons of traffic safety, deliveries and removal of parking.

John Fitzsimons, Manor Kilbride

- Objects to proposal to restrict Knockieran bridge to single lane traffic.

John Horan, Deerpark Green

- Development has been over 10 years in the making and is a prime example of a community-led initiative. Earlier Part VIII approval involved extensive consultation and there were 278 favourable submissions.
- Proposal will have eBikes as a major attraction with charging points and solar power charging points for other electric vehicles.
- Proposed development will link in with other walking and cycling trails in the county.
- Greenway has been designed to the highest safety and universally accessible standards.
- Reports submitted with the application show that the proposal will be in full compliance with all ecological, cultural and heritage requirements.
- Traffic lights with modern sensor system will be installed to provide safe crossing for greenway users and all types of road vehicles. 'Stop on red' for vehicles will be no longer than 90 seconds and studies have shown that proposals will not cause congestion.
- Vast majority of trees to be removed are conifers which would be harvested by ESB over the coming years as part of their normal process – they represent a tiny proportion of the trees surrounding the lakes.
- Conifers to be removed will be replaced with a similar number of broadleaf trees, which will result in much improved biodiversity.
- Existing 6.5km greenway has been used by thousands of people and there haven't been any complaints from adjoining landowners and farmers.

John Millar, The Green, Blessington

- In favour of greenway but objects to one-way system on bridges.

John Price, Woodend

- In favour of well-designed greenway but objects for similar reasons to those above.
- Government guidelines for greenways clearly state that project promoters must undertake appropriate consultation with landowners and communities.

- Fully loaded hay bailer needs 3.3m width before safety margin is added – carriageway width will be 3.25m at bridges. Logging vehicles and other agricultural machinery needs increased width.
- Lakeside traffic volumes are much higher than those indicated in traffic surveys.
- Emergency services have not been consulted about the planning application.
- Requests an oral hearing.

John Ryan, Baltyboys

- Objects to traffic lights and lack of consultation.

John Stones, Valleymount

- Objects to traffic lights on bridges.

Joseph Carroll, Lacken

- Objects to traffic lights and traffic increase.

Josephine & John McCarthy, Valleymount

- Extension of greenway is welcome but objects to traffic lights at bridges.
- Tullow and Newbridge have created a cantilever bridge to good effect, and this would be a good alternative.
- Traffic study should take place in the busy spring/ summer period.

Julianne Williamson, Butterhill

- In favour of greenway but objects to traffic lights and one-way system.

Julie McGuire, Ballyknockan

- In favour of well-planned greenway but objects to bridge proposals and lack of toilets, parking and consultation.

June McKeown, L8360

- Objects to use of L8360 as part of the greenway.

Karen Parkinson, St. Mary's Road

- Welcomes greenway but opposes traffic lights, and lack of consultation, parking and toilets.
- Greenway should be rerouted around Blessington.

Karen Price, Woodend

- In favour of a good greenway but objects for similar reasons to the above.

Kate Whyte, Lacken

- Objects to greenway for similar reasons to the above.
- Map highlighting the locations of proposed construction sites is extremely vague.

Kathleen Clarke, Humphreystown

- Objects to traffic lights at bridges.

Kathleen Halligan, Valleymount

- Greenway presents a welcome opportunity for many to enjoy the surroundings; however, objects for reasons relating to traffic and as above.
- Crushed stone through woods would be more attractive natural proposition than tarmac.
- Construction traffic through Valleymount village on narrow main street.

Kathleen Leonard, Valleymount

- Objects to greenway for similar reasons to above and asks for a greenway that most people in the area would be able to enjoy.
- No consideration given to the force of crosswinds on bridges which could force cyclists to be blown off bicycles.
- No details of type of fencing or its height.

Kathy Monks, Valleymount

- No objection to notion of greenway but objects to proposed traffic lights.

Katie Sullivan, Ballyknockan

- In favour of greenway but objects for similar reasons to the above.
- Traffic study does not allow for additional expected 300,000-400,000 visitors annually.
- Construction works are likely to cause disruption to species listed under Annex I of the EU Birds Directive.
- It will take decades to off-set the carbon emissions from loss of trees with replanting.
- Visitors driving to the greenway will increase greenhouse gas emissions and cycling/ walking as an alternative for the local community is unrealistic given the distances involved.
- Appropriate Assessment for 2015 greenway suggested that construction works should take place during the summer and autumn to avoid disruption to overwintering flocks of greylag goose and lesser black-backed gull. EcIA states that works should be carried out during winter months to avoid disruption to the bird nesting season.
- Proposed development should be subjected to full EIA.

Kevin Byrne, Manor Kilbride

- Objects to traffic lights.

Kevin Hanlon, Knockieran Lower

- Objects to greenway for similar reasons to the above.

Kevin, Molly & Mark Byrne, Valleymount

- Objects to traffic lights.

Lesley Murphy, Lacken

- In favour of greenway but objects for reasons above and because proposals will have a massive impact on the village of Lacken.

Liam Miley, Baltyboys

- Concerned about the use of the L8360 and proposed traffic lights.

Liam O'Brien, Baltyboys

- In favour of the proposed greenway – some investment in West Wicklow is long overdue.

Linda Cullen, Valleymount

- Objects to greenway extending around the Valleymount and Ballyknockan area and for reasons set out above.

Linda Duncan, Knockieran Cottages

- Not opposed to the principle of the greenway but objects to traffic lights and loss of parking.

Linda Keller, Brittonstown

- Objects to traffic lights and loss of parking.

Lisa Browne, Lacken

- Was in favour of greenway but plans have changed – opposes traffic lights.

Lisa Miley, Baltyboys

- Route to Tulfarris Golf and Resort should not be part of the greenway. No objection to the remainder of the greenway but would prefer not to have traffic lights at the bridges.

Lisa O'Brien, Manor Kilbride

- Plan has some good points but objects to one-way arrangement at bridges, greenway on Blessington Main Street and fencing.

Lorraine Phibbs, Manor Kilbride

- Object to traffic lights and one-way system on bridges.

Malwina Hanlon, Knockieran Lower

- Objects for reasons above.

Manor Kilbride IFA, C/O Joe Morrissey

- Raises concerns regarding dog control, obstructive parking, one-way bridges and traffic lights, walkers on public road and interference with cows.
- Disturbance of habitat will cause extensive spread of Bovine Tuberculosis.

Margaret Harpur, Baltyboys

- In favour of greenway but current walking route and traffic lights on bridges are unacceptable.

Margaret Keogh, Butterhill Upper

- Objects to traffic lights and one way system at bridges.

Maria Walsh, Baltyboys

- Welcomes the prospect of more walking routes but opposes greenway on public road and traffic lights.

Marie Tutty, Hollywood

- Objects to traffic lights and impact on N81.

Mark Hyland, Ballyknockan

- Objects to traffic lights and one way system on bridges.

Mark Moran, Britonstown

- Objects to traffic lights and one way system on bridges.

Mark Wright, Valleymount

- Similar concerns to those raised above.

Martin Cummins, Valleymount

- Likes the idea of the greenway but objects to bridge proposals and removal of parking.

Martin Hennessy, Main Street, Blessington

- Objects to removal of parking in front of shops and to the bridge proposals.

Martin O'Connor, Valleymount

- In favour of greenway but opposes one way system on bridges.

Martina Lowbridge, Valleymount

- Generally in favour of greenway but objects for similar reasons to the above.
- Suggests that an oral hearing should be held.
- Detailed traffic study is needed on Lake Drive and the R758.

Martina Shirran, Rockypool Crescent

- Conditionally in favour of proposed plans apart from traffic lights.

Mary Keogh, Knockieran

- Objects to planned traffic lights, and lack of parking and toilets.

Mary O'Sullivan, Ballyknockan

- Objects to traffic lights and insufficient parking.

Matthew & Margaret Brown, Baltyboys

- Objects to traffic lights on bridges and dogs.

Maura & Brendan Robinson, Blackrock

- Object to traffic lights.

Maura Byrne, Valleymount

- Objects to traffic lights.

Maura Hughes, Baltyboys

- Objects to traffic lights and use of public road for greenway.

Mella Keogh, Burgage More

- Similar concerns to the above.

Michael Bailey, Humphreystown House

- Not opposed to the greenway as a whole but objects to traffic lights. Walkers can use existing pathway and cyclists can use the road itself.

Michael Fenton, Rathnabo

- Objects to traffic lights and refers to congestion caused recently by temporary traffic lights.

Michael Mooney, Vallymount



- Objects to the proposal for similar reasons to the above.

Michael Rohl, Valleymount

- In favour of greenway but not as it is currently planned. Objects for similar reasons to the above.

Michael Schofield, Lacken

- Greenway could deliver a world class sustainable tourism experience in collaboration with the local community. Objects for reasons outlined above.

Michael Ulman, Rockypool Crescent

- Supports the greenway but not in its current form for similar reasons to the above.
- No justification for cutting down 159 trees on existing greenway.

Mick & Sinead Phibbs, Blackrock

- Greenway can have many benefits but objects to single lane bridges and lack of community consultation.

Neil McCartan, Baltyboys

- Objects to traffic lights.

Neil Stone, Burgage

- Asks to build the greenway but not the single lane bridge system.

Nicola Farrington, Valleymount

- Does not oppose the greenway as a whole but objects for the reasons outlined above.

Noel & Anne Nolan, Carrig Glen

- Objects for reasons outlined above.
- Council should look at the feasibility of a pontoon bridge and gangways combination.

Noel Campbell, Manor Kilbride

- Objects to traffic lights and one-way system.

Oliver Stones, Valleymount

- Objects to traffic lights.

Paddy & Maura Byrne, Valkeymount

- Supports the greenway but objects to the bridge proposals.

Paddy & Alice Ryall, Knockieran Cottages

- Welcomes greenway but asks to reconsider traffic lights.

Paddy Broe Jr, Lacken

- Fencing must be erected to stop dogs from coming out onto adjacent fields.

Paddy Broe Snr, Lacken

- As above.

Pamela & Cormac Chambers, Baltyboys

- Proposal will have some positive benefits but will also have negative impact as outlined above.
- Additional traffic will result in more speeding.
- Greenway will uproot vermin living around the lake.
- Have concerns with the proposed excavation and drainage proposals and their potential impact on adjoining property.
- Consideration should be given to access during construction.

Pat & Martha Bolger, Humphreystown

- Object to traffic lights.

Pat & Liz Riordan, Kilbride Road

- In favour of greenway but object to traffic lights.
- Unsure how dual use of pathway to front on Kilbride Road will work given its narrowness.
- Seek assurances that the proposal will not affect right of way at Ivy Terrace.

Pat Quinn, Knockieran Lower

- Objects to proposal for reasons raised above.

- Highlights bird species present in the area and questions if these are covered in surveys.
- There is a danger of leaked oil from vehicles in car parks seeping into the lake.
- Notes dangers of vehicles doing 25kph or more on greenway.
- A local democratic discussion needs to take place so that concerns are heard and acted upon.

Patricia Keogh, Butterhill

- Objects to proposed traffic lights.

Patrick & Barbara Ryan, Baltyboys

- Objects for similar reason to the above.
- Summer can bring chaos around Blessington Lake in terms of car parking, crowding, overflowing bins, etc.

Patrick & Orla Nolan, Lacken

- Not fully against the greenway but has concerns about certain aspect as per above.
- There are no traffic calming measures as part of the proposal.

Patrick Boylan, Baltyboys

- Would be in favour of greenway but unable to support it for similar reasons to the above.

Patrick Byrne, Valleymount

- Objects to traffic lights and single lane system on bridges.

Patrick Dorgan, Portersize Transport Services, Moone, Co. Kildare

- Concerns about driving lorry around corners that will be utilised by many walkers.

Patrick Geoghegan, Valleymount

- Objects for similar reasons to those raised above.

Patrick Mooney, Valkeymount

- Objects for similar reasons to those raised above.

Patrick Winters, Ashton, Blessington

- Supports the overall provision and extension of the greenway but objects for similar reasons to the above.

Paul & Suzanne Sullivan, Ballyknockan

- Objects to greenway for similar reasons to the above.
- Actual available width at bridges for cyclists is 2.18m which contradicts the design statement that the proposed greenway will “widen to 4m in the vicinity of the trailhead car parks where the volume of pedestrians and cyclists is anticipated to be higher.”

Paul Miley, Baltyboys

- Objects to certain aspects of the greenway as per above.

Paul Quinn, Manor Kilbride

- In favour of the concept of greenways but shares similar concerns to those raised above.
- Objects to visual impact of traffic lights and night-time light pollution.

Paula O’Sullivan, Burgage Manor

- Nothing against greenway but objects to single lane proposal at bridges.

Peter & Brid O’Sullivan, Baltyboys Lower

- Object to traffic lights on bridges.

Peter & Elizabeth Carroll, Knockieran

- Objects to lights on Knockieran bridge and issues of security.

Peter & Siobhán Sheehan, Humphreystown House

- Objects to traffic lights.
- Bridges may not be fit for purpose when traffic volumes increase significantly.

Peter McDonald, Valkeymount

- Objects to traffic lights and single lane system.

Phil Leonard, Valkeymount

- Objects for similar reasons to the above.

Philip Ryall, Baltyboys

- Objects to traffic lights.

Rachael Murphy, Deerpark Close

- In favour of greenway but objects to traffic lights.

Rosanne Kelly, Manor Kilbride

- Objects to traffic lights.

Rachel & Niall Jones, Valkeymount

- In favour of greenway but object to traffic lights.

Raymond O'Sullivan, Naas

- Objects for similar reasons to the above.
- Application should be declared invalid.
- No consideration given to access for the disabled.
- Proposed development encroaches upon the SPA on numerous occasions – no definitive line of drawings to show European Sites.
- Describing impacts of potentially moderate adverse significance on qualifying interests as being unlikely is not good enough – no evidence, scientific or otherwise, that the applicant identified, analysed and made complete, precise and definitive findings and conclusions capable of removing all scientific doubt.
- Council have underestimated the importance of the SPA as a national and international resource for species of conservation interest.
- Documentation does not address the reasons for the declining numbers of Greylag Geese and Lesser Black Backed Gull on the reservoir.

- Species of conservation interest were not recorded or monitored for the purposes of the application as surveys were carried out during the months of August and January.
- No consideration given to disturbance of the qualifying interests during the operational stage of the proposed development, and little realistic consideration has been given to the habitat destruction of other waterfowl species.
- EIA screening places inappropriate emphasis on land use changes, demographic changes or visual changes and social changes, lifestyle changes, and impacts on flora and fauna and negative environmental impacts are minimised to insignificant.
- Proposed development will result in the construction of a 4m wide road around the reservoir that will be visible from elevated land surrounding it. Proposal will have adverse visual impact and will alter the established landscape character.
- Due to nature, scale and environmental sensitivity of the proposed development, a very strong case can be made for the requirement of an EIAR.
- Proposed development will adversely affect the integrity of the site and will have a devastating effect of the SPA.
- Impact from disturbance and human activity are ignored when addressing the potential impacts to the special conservation interest species and mitigation measures are confined solely to pollution of surface water and works associated with construction activity.
- Estimated removal of 7,265 trees, importation of 55,625m<sup>3</sup> of material and the extraction of 36,191m<sup>3</sup> of material, and 300,000 visitors driving to the site cannot be considered sustainable development.
- Number of feeding and nesting birds in the Burgage estuary which forms part of the existing greenway have reduced significantly – without doubt due to disturbance from both human and animal activity.

- Proposal contradicts Item 7.1 of the Development Plan which states that “tourism assets will be managed in a sustainable manner to protect against any detrimental impacts on the environment and local communities.”

Rena O'Neill, Santry Hill, Blessington

- Objects to removal of parking on Blessington Main Street and proposed traffic lights on bridges.

Richard & Lorraine Willoughby, Baltyboys

- Supports the greenway but objects for similar reasons to the above.

Richard Lawrie, Ballyknockan

- Objects to traffic lights and one-way system as part of the greenway project.

Richard Shercock, Crosschapel, Blessington

- Objects for similar reasons to the above.
- Existing section of greenway consists of a stone footpath approximately 2m wide, threading between trees, blending into the countryside, and causing minimal disruption to wildlife. Greenway as planned will encourage groups of cyclists to use it as a racetrack. Speed limit of 10 kph should be imposed on any cyclists and these should dismount on areas of congestion.
- Greenway should be opened to horse riders.
- Objects to construction of underpass adjacent to Blessington bridge as it will become a magnet for undesirables.
- Objects to public funds being used to construct electric vehicle charging facilities and drinking water stations.

Robbie Miley, Baltyboys

- Objects to traffic lights and use of L8360.

Roma Duffy, Knockieran Lower

- Delay at bridges will be at most 90 seconds – there are numerous single file bridges in the country and these are not a major problem.

- Bridges impacted by greenway all have good sight lines across and so emergency services will be able to rely on traffic allowing them to pass out of light sequence.
- If practical, emergency services could use the shared path to cross the bridge as has been done in Dún Laoghaire and other places.
- Bridge as it stands is not sufficiently wide to comfortably allow two vehicles pass each other so this is a necessary alteration.
- Toilets should be provided at sensible points along the route and provision should be made for café truck type businesses in car parks (water connection, power supply).
- Where possible, pedestrians and cyclists should be segregated, particularly in Blessington and other villages.

Ron Corry, Manor Kilbride

- Welcomes greenway fully around the reservoir but objects for similar reasons to the above.

Ronan & Sinead Hennessey, Hennessey's Bar, Main Street

- Object to removal of car parking on Main Street and traffic lights at bridges.

Ross Butler, Valleymount

- In favour of greenway but objects to traffic lights.

Ruaidhri O'Brien, Burgage More

- Supports greenway but objects for similar reasons to the above. Proposed plan is a short-term one and will eventually need to be replaced.

Sadie Miley, Baltyboys

- Objects to traffic lights and use of L8360.

Sally Anne Ryall & Willie Ryall, Knockieran Cottages

- Do not object to the principle of the proposed greenway but objects for similar reasons to the above.

Sally Hughes, Baltyboys



- Do not oppose the greenway completely but objects to traffic lights and use of public roads.

Sandra Auld, Knockieran Upper

- Recognises benefits of greenway to both locals and visitors but opposes traffic lights.

Sandra Halford, Baltyboys

- Looks forward to having the greenway around the lake but objects to proposed traffic lights and one-way system.

Sarah Price, Blackrock

- Objects to proposed greenway for similar reasons to the above.
- There will likely be a significant effect on bats and proposed mitigation is ineffective.

Seamus McDonnell, Lacken

- Objects to narrowing of bridges to single lane and traffic lights

Seamus Miley, Baltyboys

- Objects to use of L8360 and traffic light system.

Seamus Walsh, Burgage More

- Objects for similar reasons to the above.
- Section of the proposed greenway from the Avon to Knockieran bridge needs a better route than proposed – 56 houses built and a further 100 proposed will use narrowed roadway to access N81 and the town. There are also regular funerals at the graveyard and this section of the road is part of the Dublin Bus 65 route.
- No proposal for extra parking at the Avon which is the existing starting point for the greenway – was always full during summer months.
- Requests that an oral hearing be held.

Sean Ascough, Lacken

- Requests that an oral hearing be held.

- In favour of a well-planned greenway in principle but objects for similar reasons to the above.
- There are anomalies with Knockieran bridge measurements.
- Requires acceptable gated crossing of greenway for right of way.
- All watercourses not shown on drawings require drainage.
- Rock armouring should not be installed at the sheltered part of the lakeshore from Baltyboys bridge to sailing club.

Sean Miley, Boystown

- Objects to traffic lights and use of public roads.

Sean Price, Blackrock

- Objects to proposed greenway for similar reasons to the above.

Shane Carroll, Lacken

- Objects to traffic lights and one-way system at bridges.

Sharon & Alan Cowley, Knockieran Lower

- Objects to loss of privacy, and the potential for noise pollution, security issues and parking on the roadside outside their property, as well as for the reasons outlined above. Asks for additional planting to ensure privacy.
- Asks for double yellow lines to be placed on both sides of the road from the rowing club through to Knockieran Upper.

Sharon Ryall, Baltyboys

- Objects to traffic lights and one-way system on bridges.

Sheila Kinane, Valleymount

- Objects to traffic lights and barriers at bridges.

Siobhan Brogan, Ashton, Blessington

- Objects to traffic lights and one-way system at bridge and pedestrianisation of Main Street.

Siobhan Mc Evoy, Ballyknockan

- Vast majority are in favour of the greenway but objects for similar reasons to the above.
- Rock armour will have adverse impacts on area of outstanding beauty.
- Unclear how greenway will sit in the landscape from drawings.

Stephen Donnelly TD, Greystones

- Objects to single lane and traffic lights on bridges and what appears to be inadequate provision of car parking.

Steve Doran, Blessington Manor

- Fully supports the greenway – as a result of current greenway, both young and old are more active, more connected with nature and more happy with themselves. Extending it further would mean that benefits are maximised for more locals.

Stuart & Gillian Smyth, Baltyboys Upper

- Supports a well-planned greenway but objects for similar reasons to the above.

Susan Rossiter, Burgage Manor

- In favour of greenway but objects for similar reasons to the above.
- Council owns three fields at Avon Rí – one of these should be used for greenway parking.

Tara Blake, Valleymount

- Objects for similar reasons to the above. Recognises that the greenway will bring some advantages to the area, but people are not ready for it in the area.
- Concerns about the section of greenway along the N81.

The Alfred Beit Foundation, Russborough

- Russborough House and Parklands reconfirms its complete support for the greenway, which they believe, will bring significant social and economic benefits to West Wicklow.

The Valleymount Peninsula Wildlife Project, Katie Sullivan & Vickie Doyle, Vallymount

- Raises similar concerns to those above.
- Areas where there is an intention to clear trees has also been identified as ecologically sensitive areas.
- Volume of people and cars will have an adverse impact on the receiving environment and the SPA.
- Designation of SPA for Greylag goose and Lesser Black-Backed gull has not been adequately considered.

Theo Clarke, Sroughan

- Whole community is behind the project but objects for similar reasons to the above.
- Farm community would like the land side of the walkway fenced with 1200mm high chain link wire for the safety of pedestrians and livestock.
- Planning for locals in the area states that all sewage systems must be 210m from the lake and 110m from streams to avoid pollution.

Thomas Butler, Valleymount

- In favour of greenway but objects to traffic lights.

Thomas Cahill, Valleymount

- Objects to greenway for similar reasons to the above.

Thomas Grassl & Silvia Valles Barrera, Humphreystown

- Looking forward to benefits of the greenway but are concerned about the proposed one-way system with traffic lights.

Thomas Kelly, Humphreystown

- Objects for similar reasons to the above.
- Lack of toilet facilities will lead to an invasion of local private property and fencing will be damaged.

Thomas Kelly, Hollywood

- Objects for similar reasons to the above.
- Proposed works will disrupt curlew.

- Tarmac surface should not be used beside drinking water.
- Infrastructure such as dog proof fencing, proper toilets and car parks are needed for the greenway to be done right.

Thomas Tutty, Hollywood

- Objects to traffic lights and central divides on bridges.

Tom Mooney, Vallemount

- Objects to the proposal for similar reasons to the above.

Tomas A. Hand, Carrig Blessington

- Objects to traffic lights and lack of consultation.

Tony Gallagher, Rathnabo, Blessington

- Objects for similar reasons to the above.

Tony & Annette Kavanagh, Baltyboys

- Objects to traffic light proposals, lack of fencing, removal of trees and use of road for walkers.
- Otherwise, no objection to proposed greenway.

Tulfarris Hotel and Golf Resort, C/O Jim Murphy

- Supports the upgrading and extension of the greenway for tourism reasons, and for health and wellbeing and all year-round employment.
- Success of Waterford Greenway is a perfect example of how a greenway can rejuvenate a community and offer high-value, memorable experience.
- Need to ensure that appropriate facilities are provided to allow people of all ages to safely access local resources and to partake in physical activity within their local community.

Turlough & Santa Nolan, Woodend, Blessington

- Objects for similar reasons to the above.

Turlough Kinane, Westpark, Blessington

- Conditionally in favour of greenway extension subject to cantilevered bridge structures.

- Experience of one-way bridges and accidents should be noted, e.g. at Slane and Carragh near Naas.

Valerie Hanlon, Knockieran Lower

- Greenway would be a wonderful asset to the area but objects to traffic lights and parking.

Valleymount & Ballyknockan Forum, Valleymount Hall

- Objects for similar reasons to above.
- Photographic evidence of litter around the lake attached along with circulation leaflet urging action against the proposed traffic lights and one lane system on Blessington Lake bridges.
- Signed petition attached to the submission.

Valleymount GAA & LGFA, Valleymount

- Object to traffic lights and one-way system at Valleymount/ Humphreystown Bridge as the R758 is narrow and unmarked and there are limited sightlines at the Valleymount GAA pitch entrance.
- There will be substantial risk of rear end shunting and additional risk on entry/ leaving Valleymount GAA club and both ESB/ WCC lakeside amenity car parks.
- There will be a delay/ impediment to emergency services accessing the GAA grounds.
- There will be long tailbacks at training/ matches.
- Full Traffic and Transport Assessment and Road Safety Audit needed.

Ivor Fitzpatrick & Company Solicitors, St. Stephen's Green on behalf of Victoria Doyle & Stuart Hayes, Valleymount

- Observer and public were misled as to the nature and extent of the area of the proposed development by naming it Blessington eGreenway.
- Not aware that there is an existing greenway at this location to be upgraded and no specific detail is set out. Notice should be invalidated.

- Unclear whether there will be a process for creation of the greenway through creation of public right of way and the provisions of Section 261 of the Planning and Development Act, (as amended), or whether it is to be provided under Section 49 or 51 of the Roads Act. Also unclear if CPO or any extinguishment of rights over land.
- **EIA** - In deciding whether EIA is required, no consideration was given to Schedule 5, Part 2, Paragraph 10(dd) of the Planning and Development Regulations 2001, which provides that all private roads exceeded 2000m in length require a mandatory EIA. Road is defined as including a cycleway with regards to Section 68 of the Roads Act, 1993 (as amended).
- Board accepted recently in the Kerry Greenway case that it was a road and the Directive is required to be interpreted as applying, particularly where the road is approximately 33km in length.
- Would be entirely incongruous and contrary to the EIA Directive if there was one threshold provided for public roads and a different required for private roads.
- Notice fails to identify the full nature and extent of development where the proposed bridge crosses Annacarney stream – only reference is to a crossing of the Annacarney stream. Should be considered as sub-threshold development for the purposes of EIA.
- Car parks are car parks in their own right and should be considered sub-threshold development.
- Would appear that rock armour is going to be located within European site and this is absent from the Notice. Also, lack of reference to design proposals and consideration of the source of material, the manner in which it is to be transported and installed and the effects on a European site, and the potential for pollution, in particular hydrocarbon, cannot amount to a preliminary examination for the purposes of the EIA Directive.
- No reference in EIA report to the NIS – fails to address obligations under the EIA Directive as direct and indirect effects in terms of noise impact and pollution are likely to be very significant on the protected sites.

- WCC is the Competent Authority for EIA and this is inappropriate as to how implementation of European law should be conducted.
- When dealing with the assessment of effects, WCC appear to apply Schedule 7 but when it came to the identification of thresholds, they ignore Schedule 5. Board must reject this application on the basis of the failure to consider and address the EIA Directive.
- **Habitats** – For a substantial part, the route and the boundary of the SPA and coterminous and it is not clear whether the site of the development is limited to the route of the greenway.
- Indication in NIS that route of greenway is less than 10m from SPA fails to properly acknowledge that part of the development will be within SPA – entire basis of NIS is flawed and fundamentally incorrect.
- Proposal will see placement of rock armour and extensive tree removal with no local reinstatement – difficult to understand statement that no impacts to conservation interests or habitats thereof are likely to arise.
- Little reference to noise disturbance during construction and in particular the construction of the bridge and installation of rock armour.
- Concerning that no species-specific surveys were carried out for QI species.
- There is evidence of other important species being located in the area of the proposed development including otter, badger, reptiles, amphibians, bats and hedgehog.
- In-combination assessment does not include rowing facility, which now appears to be the subject of judicial review.
- Documentation acknowledges the sensitivity of the site in terms of red squirrel, pine marten and other species protected under the Habitats Directive – approach adopted in terms of protection is unreasonable, e.g. examining trees for pine marten nests subsequent to scheme approval. Approach at variance with obligations under Habitats Directive to protect species extending beyond European sites.
- **Substantive Issues** – design is in such preliminary stage it is impossible to determine if project will require a further series of procedural steps, e.g. CPO.



- No SEA was carried out in respect of the 2010 Recreational Opportunities Feasibility Study under which the proposed development arose. All subsequent steps are therefore equally ultra vires, invalid or void.
- Difficult to understand 2017 Part XI procedure was not accompanied by an Appropriate Assessment – Board cannot graft on to a Part 8 which is fundamentally invalid.
- At the one level there are platitudes in terms of health, social and community interaction while at the same proceeding to extend car parks and promoting car use.
- There has been a lack of consultation with emergency services about their ability to access the area at speed.
- References within the Wicklow County Development Plan, 2016-2022 to the expansion of the Blessington Greenway walk around Poulaphouca Reservoir are focused on Wicklow alone; however, the proposed development includes lands in County Kildare.
- Proposed development will come within metres of the observers' property and there are no details in respect of fencing or screening. Significant roads and bridge works in vicinity of observers' home are not covered in the Planning Statement.
- Woodland designated as an ecologically sensitive area in the Vallemount Section Ecological Constraints map extending into observers' property has not been considered in any detail in the Planning Statement.
- Observer is a sensitive receptor, yet application documentation report ignores them, their family home, land, garden and amenities and property values. All matters not considered by applicant in balanced and fair way.
- Observers' entire property will be opened up and will be considerably insecure as there would be an exposed flank to the east. No details of any fencing and consideration of characteristics and sensitivities of observers' lands, which has a working apiary.
- No analysis or consideration of the bridge at Annacarney and the dangerous nature of this single roadway.

- Access to and from observers' property is at a location where there is limited sight visibility.
- Scheme will destroy the unspoilt character and wooded and bucolic nature of the environment.
- Wholesale destruction of trees will destroy habitat of red squirrel and pine marten.
- Trees to be removed are mature and have sequestered considerable carbon dioxide and replacement trees will be broadleaf saplings that evidently will not reach maturity for an estimated 60-80 years.
- Removal of trees represents a loss of screening for privacy and wind shelter reasons. Whole purpose of tree planting was to negate wind funnelling and to provide soil stability to the ground bordering the foreshore.
- There are donkeys on observers' land and they can cause injury to passing people who seek to pat or feed them.
- Observers' driveway is the only safe turning point before Annacarney bridge and parking and turning at this location will be exacerbated.
- Route will have to be fenced, lit and patrolled and this will add to the undermining of the amenities and character of the area.
- Proposed development should be rejected in its totality.

Vincent Tivnan, Santry Hill Blessington

- Not against the greenway if done properly but objects to traffic lights and inadequate parking and toilets.

Vivienne Cunningham, Knockieran Lower

- In favour of greenway but objects to traffic lights and one-way system on bridges.

West Wicklow Environmental Networks, C/O Emma Smith, Hollywood

- Welcomes the development of the Blessington greenway as it will provide greater access to the outdoors, nature, increase activity levels and provide economic benefits.

- Development should endeavour to ensure and be cognisant of the need to protect and promote biodiversity – on-site ecologist should be employed during construction.
- Welcomes plan to replace felled trees with native species. Tree felling should be limited to months outside of bird breeding season. Route should try to avoid mature native trees.
- CEMP should be developed for the construction phase.
- Welcomes plan to provide a local bus link to connect the villages along the greenway route.
- Recommends that visitors are encouraged to use public transport to access the greenway where possible and bus stops should be provided at access points to the greenway.

West Wicklow House, Peter Eustace, Main Street, Blessington

- Supports greenway project and the much-needed business for pub.

William & Marrion Miley, Baltyboys

- Objects to traffic lights at bridges and use of L8360.
- Traffic lights at Baltyboys bridge may impact on congestion on the N81 junction.

Yasmin Byrne, Tallaght

- Objects for similar reasons to the above.

Yvonne Boud, Humphreystown

- In favour of a well-planned greenway in principle but objects for similar reasons to the above.

## 13.0 Appendix 2 – Summary of Applicant’s Response to Individual Submissions

*Traffic lights on existing bridges:*

- National Investment Framework for Transport in Ireland (NIFTI) outlines that transport planning will encourage the use of active travel and public transport

ahead of private transport, and maintenance or optimisation of existing assets is also preferred to extensive enhancement or outright new infrastructure. Proposal for existing bridges is consistent with NIFTI.

- Additional traffic counts were undertaken in July 2022 and there were further surveys in May 2023. Data presented in original report is still valid and relevant.
- Traffic congestion, delay or inconvenience will not be unacceptable at the lights – proposed length of time for traffic signals to turn green will not exceed 2 minutes.
- Width of traffic lanes at 3.25m provides sufficient distance for vehicles to pass, including larger vehicles. Maximum width of agricultural trailer is 2.55m. It will be possible for wider 3.5m machinery to pass with the support of traffic management procedures. Traffic lanes with lower widths are used by emergency vehicles across the road network.
- Traffic lights are also deployed in rural areas and risk of carjacking is not considered a sufficient reason to avoid introduction of traffic control. There are similar examples at Inniscarra Bridge, Co. Cork; Kildangan Bridge, Co. Kildare; R415 Rathbridge Road, Co. Kildare; and Slane Bridge, Co. Meath.

*Public Consultation:*

- Report titled “Response to An Bord Pleanála RFI Item 12 – Public Consultation and Communication” (Jan. 2024) sets out details of public consultation, which includes consultation for a feasibility study (2010) for the delivery of the phase one 6km trail; consultation for the Part VIII (2017); community engagement with local community groups; formal council meetings; setting up of greenway project board including local community representative; project updates within WCC’s newsletter; landowner engagement (including ESB); appointment of a project liaison officer; setting up of communications working group (2023); and launching of dedicated greenway website.

*Toilet Facilities:*

- As above.

*Traffic impact:*

- Detailed and updated traffic surveys were conducted in 2023 and “Traffic and Transport Assessment” report dated December 2023 examines the potential impacts associated with the operation of the development, in relation to traffic and transportation.

*Car parking provision:*

- Examined in Transport and Traffic Assessment – 100 new spaces proposed with a total provision of 501 spaces over 10 locations (including 85 EV spaces) and 6 bus parking spaces at Knockieran. Projected that the greenway will attract up to 300,000 trips annually, with a weekend peak of 765 daily car arrivals. As a worst-case scenario, it is assumed that all vehicles would arrive within a 4-hour window during the peak weekend period, resulting in 382 vehicles for a 4-hour weekend window.

*Environment:*

- *Impact on birds:* Proposed development encroaches upon the SPA to provide erosion protection measures, water crossing facilities and to minimise loss of trees – occurs at 12 locations with areas varying between 15 sq.m. and 3,491 sq.m.
- Surveys of Greylag goose show that this species does not utilise the portion of the reservoir south of Blessington Bridge – therefore, no potential for this species to be impacted by the proposed works. Flocks will nonetheless be monitored regularly.
- Much of the proposed route will not be located on shoreline and disturbance from operational phase not considered significant.
- Mitigation for construction phase impacts has been drawn up as part of the AA process.
- Shoreline vegetation will be retained where possible, allowing a visual screen to be retained.
- Work activities will not occur over the wintering period within one hour after dawn, and one hour before dusk – regular roost monitoring will be undertaken when works are within 1km of identified roost areas. If impacts on roosting or

foraging behaviour are identified, possible additional mitigation measures may be required, including screening works with a barrier to assist in noise transmission, and reducing works hours.

- *Impact on other species:* Area under survey is not within a Margaritifera sensitive area and no suitable habitat occurs. No instream works for any watercourse are planned and no works will take place within aquatic areas of the reservoir.
- EIA screening was undertaken, and it was determined that an EIAR was not required.
- *Habitats Directive:* Generic conservation objectives are available for Poulaphouca Reservoir SPA and the EC advises that in such cases, Appropriate Assessment should assume as a minimum that an objective is to ensure that species are not significantly disturbed. It was determined that there will be no significant disturbance to species with proper implementation of mitigation measures.
- *Archaeology:* Archaeological Impact Assessment prepared by suitably qualified archaeologist.
- Area has been previously disturbed by the tree planting and no works are planned in the water. All recorded archaeological sites within 100m have been noted.
- Previous assessment in 2015 recommended that, given the limited impacts required for the track and the previous ground disturbance within the forested margin, archaeological monitoring rather than testing should take place. Current assessment concurred with these recommendations and proposed that mitigation should take the form of constant archaeological monitoring within the vicinities of recorded archaeological assets. Archaeological mitigation also recommended at the sections at Vallemount and Knockieran and Russborough car parks.
- Proposed development will not directly impact upon archaeological remains, given the limited impacts required for the track and the previous ground disturbance within the forested margin. Any previously unrecorded

archaeological remains uncovered by groundworks will be preserved by record.

- Archaeological Impact Assessment will be updated to include large saddle quern scatter and flint knapping site and 3 polished stone axes at Baltyboys.

*Fencing:*

- Most fencing will remain unaltered, and landowner engagement will involve a case-by-case review of boundaries to understand each individual stakeholder requirements and with reference to the existing provision. Primary goal is to prevent trespassing and to create a secure environment for all stakeholders.
- WCC will ensure that boundary treatments adhere to the “Code of Best Practice for National and Regional Greenways”.
- WCC will draw upon fencing types already established by TII.

*Trees:*

- Many trees to be removed are non-native species and occur within commercial plantations that were not planted for the purposes of supporting biodiversity. Each tree to be lost will be replaced by native broadleaf trees. Biodiversity value of these trees will increase by the year.
- WCC has committed to and will replace every tree lost in the delivery of this greenway on a ‘one for one’ basis and has demonstrated that this can be achieved by planting adjacent to the greenway and utilising Wicklow County Council owned lands. Also committed to planting native trees in areas that have suffered from wind damage.

*Other issues:*

- *Visual amenity:* Water level of the reservoir is regularly changing, which affects the stability of the shoreline resulting in erosion. There is existing rock armour and additional protection measures are required to prevent further erosion and to protect the proposed development.
- Blessington Lakes eGreenway Landscape Plan describes the maintenance required to allow the proposed planting treatments to flourish and reach their design potential and outlines the maintenance operations required after

completion of the planting works and provides a framework for the long-term management of the scheme.

- *Safety, security and management:* Outline Maintenance and Management Plan has been prepared and this will provide a robust framework for the effective and safe operation of the greenway.
- *Control of dogs:* Outlined Maintenance and Management Plan includes measures for controlling dogs.
- *Litter disposal:* Bins will be provided at car parks.
- *Materials proposed for greenway surface:* Pavement proposed is to be provided in accordance with TII publication Rural Cycleway Design (Offline & Greenway) DN-GEO-03047 August 2022.
- *Shared use of L8360 road:* Quiet residential road with relatively low volume of vehicular traffic. Proposal to share this road is in accordance with the Irish Cycle Manual.
- *Impact on parking in Blessington:* Technical Note on parking arrangements on Blessington Main Street for Blessington eGreenway addresses how the proposal aligns with DMURS with respect to segregation between vehicular traffic and active travel.
- *Drainage systems:* Will be addressed through a Section 50 application (of the Arterial Drainage Act) to the OPW.



## 14.0 Appendix 3 – Further Information Request

The Board, in accordance with Section 177AE(5)(a) of the Planning and Development Act, 2000 (as amended), hereby requires the applicant to furnish the following further information in relation to the effects on the environment of the proposed development:

Information to Address Section 177AE (5)&(6)

Section 177AE of the Planning and Development Act 2000, as amended requires at subsection (5) that the Board in its consideration of the application for approval, take the following into account:

- (i) The likely effects on the environment
- (ii) The likely consequences for the proper planning and sustainable development of the area
- (iii) The likely significant effects of the proposed development on any European sites.

While part (iii) is addressed separately in the next section, the application documentation submitted to the Board fails to fully address parts (i) and (ii) above and you are requested to provide additional information to facilitate the Board in its consideration of this requirement of the approval application.

Likely Effects on the Environment and Consequences for the Proper Planning and Sustainable Development of the Area

### **Procedural**

1. The Board notes the preliminary nature of the drawings submitted with the application for approval. The submitted scale of 1:2000 at A3 and the submitted quality of the “high” resolution digital drawings are not adequate for the Board to properly assess the proposed development in terms of its impact within its immediate context and where it adjoins, overlaps/ encroaches or is in proximity to designated sites. Drawings should be of an appropriate scale/ resolution for hard/ digital copies respectively, and engineering details should be shown along the route to include land ownership, levels, cuttings and embankments, extent of rock armour, bridge structures, existing and proposed fencing, detailed junction design and signage, watercourses, drainage, landscaping, lighting, details on car

park extensions and facilities, rights of way/ extinguishment of rights over land, etc.

2. A number of submissions have been received by the Board in relation to existing access and rights of way to the shoreline. The applicant shall engage with parties with rights of way over the proposed eGreenway with the view to providing continued access that does not interfere with the safe operation and free flow of the eGreenway. Rights of way shall be clearly highlighted on application drawings and proposals shall be submitted to the Board on access arrangements, together with evidence of all agreements reached with parties.

### **Traffic and Transport**

3. The Transport Assessment accompanying the planning application and the Bridge Shuttle Study rely on traffic surveys that were undertaken from Tuesday 4<sup>th</sup> May – Wednesday 19<sup>th</sup> May 2021. These surveys took place during the gradual lifting of lockdown restrictions associated with the Covid-19 Pandemic when Level 5 restrictions were being removed and when indoor hospitality remained closed. All non-essential retail reopened for the first time in over four months on 17<sup>th</sup> May 2021. Having regard to the concerns raised in submissions on the application for approval that traffic surveys conducted during lockdown do not accurately represent the current usage of the local road network, the Board requests updated traffic surveys that will properly reflect existing movement patterns around the route of the proposed eGreenway. This should include an assessment of the traffic situation at weekends when people are attracted to the lake for leisure and amenity purposes. The Transport Assessment should be updated to reflect the current usage of the proposed local road network from updated surveys and the impact of the proposed eGreenway on all modes of transport.
4. The Board is concerned that the proposed eGreenway may attract significant journeys by private car with an overall potential to generate increased emissions, congestion and motor traffic dominance in the surrounding area. The applicant should submit to the Board a comprehensive sustainable transport access strategy for the eGreenway that should include measures to minimise private car use.

5. The applicant shall carry out a review of the eGreenway design having regard to the requirements of the TII publication “Rural Cycleway Design (Offline & Greenway), DN-GEO-03047, August 2022”. The applicant is referred to Section 4 of these Design Standards and to Table 4.2, which sets out Rural Cycleway (Offline and Greenway) Design Requirements. The applicant shall also prepare a Safety and Quality Audit of the proposed eGreenway in accordance with Appendix A of the TII document and Section 5.4 of the Design Manual for Urban Roads and Streets. This shall include universal accessibility considerations and confirmation that the eGreenway can be used by people requiring mobility assistance and those with sight impairment. Road crossing details shall be in accordance with Section 5 of the document, e.g. tactile blisters shall be provided where applicable. Consideration shall also be given to potential crosswinds.
6. The Board notes the gradient and road conditions of the Tulfarris section of the proposed eGreenway. Consideration shall be given to redefining this section of the eGreenway as a link route. Additional link routes to the eGreenway and proposed treatments to warn motorists of pedestrians and cyclists shall also be considered from other points along the eGreenway, e.g., Blessington and the villages. The applicant is referred to Section 3.4 of the relating to the use of existing local and unclassified road infrastructure.
7. The applicant shall demonstrate compliance with the Design Manual for Urban Roads and Streets where the proposed eGreenway interacts with urban roads and streets with a speed limit of 60 km/h or less. In particular, the applicant is requested to assess the potential for conflicts between cyclists and pedestrians and loading/ unloading arrangements on the sections of the eGreenway through Blessington.

### **Greenway Management and Operation**

8. The applicant shall carry out a review of the eGreenway facilities having regard minimum requirements for ancillary infrastructure set out in the Rural Cycleway Design (Offline & Greenway) Standards, August 2022. In particular, the Board requests the following:
  - Proposals for toilet facilities to serve the proposed eGreenway at appropriate locations.

- Identification of desirable amenities, points of interest and rest areas within the study area that could be potential stopping points for users of the eGreenway and where agreements can be put in place for toilet facilities to be made available for public use.

The eGreenway should have the necessary facilities for a good visitor experience taking advantage of scenic viewing points.

9. The applicant is referred to the guidance on greenway maintenance and management as set out in Chapter 9 of Rural Cycleway Design (Offline & Greenway) Standards and to Appendix D: Cycleway Pavement Routine Maintenance. The Board requests the submission of a greenway management plan that should include the following:
  - i. Details of maintenance and management proposals.
  - ii. Fencing and boundary treatments.
  - iii. Hours of operation and access arrangements.
  - iv. Measures for controlling or for implementing an outright ban on dogs, apart from guide dogs, (the applicant should note that the Department of Housing, Local Government and Heritage has concerns regarding the impact of dog fouling on water quality and dogs roaming off lead being a source of considerable disturbance to birds and mammals).
  - v. An emergency access plan for the facility including details of the demarcation and/or safety barriers etc. proposed between the eGreenway and the public road at bridges.
  - vi. Provision of a greenway code of conduct incorporating a “leave no trace” philosophy.
  - vii. A plan for monitoring and evaluation as set out in accordance with Section 8 Rural Cycleway Design (Offline & Greenway) Standards.

### **Water Environment**

10. Submit the following information in relation to drainage and the water environment:

- i. A detailed survey shall be carried to ascertain all watercourses/ ditches that drain into the lake and appropriate drainage shall be designed to facilitate the movement of water from the upper side of the eGreenway to the lakeside. Overall proposals should be provided on how to deal with surface water run-off during construction and when the eGreenway is completed.
- ii. The applicant is requested to address all items of concern raised by Dublin City Council Water Services and Irish Water.
- iii. The applicant shall confirm the locations around the eGreenway that are in close proximity to the existing foul sewer network with the view to providing toilet facilities to serve the eGreenway. Any proposals to provide toilet facilities that are not connected to the foul sewer network shall demonstrate how waste percolation facilities can be responsibly sited adequate distances away from the reservoir and feeder streams in compliance with the relevant guidance and Development Plan policies.

## **Ecology**

11. The applicant is referred to the detailed submission on the proposed development from the Development Applications Unit of the Department of Housing, Local Government and Heritage and in particular to matters relating to permanent habitat loss and significant disturbance. The applicant is requested to provide a comprehensive and detailed response to each of the issues raised in the submission received by the Department with regard to nature conservation. In particular, the applicant shall address the following:

- i. Provide an estimation of the amount and spatial extent of individual habitats that will be lost to the proposed development to assess whether the proposed mitigation and compensatory measures are adequately detailed to be successful and are appropriate to ensure that there is 'no net loss' of biodiversity (National Biodiversity Action Plan, 2017-2021).
- ii. The Board agrees with the Department that tree planting with equivalent numbers of trees to be lost may not provide adequate compensation for the loss of mature woodland habitat. The

applicant should consider alternatives such as existing woodland restoration.

- iii. The Department notes that the eGreenway will require the removal of over 7,000 trees, some of which are likely to harbour bat species. The applicant shall ensure that all surveys for bat species, otter and all species protected under the Wildlife Act, 1976 to 2021 (badger, red squirrel, pine marten and common frog) are adequate to determine all impacts.
- iv. The wet willow-alder-ash woodland (WN6) and mosaics with other habitats recorded on site shall be subject to further field survey at an appropriate time of the year by a suitably qualified ecologist to determine whether Annex I priority habitat Alluvial Forest is present and suitable mitigation shall be put in place if required.
- v. Further investigations are required to determine the presence of tufa forming spring/ seepage within the development footprint, as well as Marsh Fritillary and rare plants.
- vi. A landscaping plan and details of a management and maintenance plan shall be submitted to the Board outlining measures for the protection and enhancement of biodiversity along the eGreenway and wider ESB owned lands. This should include a mowing plan to ensure local areas of foraging, resting and hibernating are maintained for pollinating species. The applicant is referred to the All Ireland Pollinator Plan, 2012-2025 in this regard.
- vii. Proposals for assessing recreational disturbance and monitoring during the operational phase shall be submitted to the Board.

### **Public Consultation**

12. Prepare a report outlining all consultations undertaken to date and any proposed consultations with the public and any other stakeholders in accordance with Appendix 1 – Public Consultation Guidelines of the Strategy for the Future Development of National and Regional Greenways. Public consultation shall comply with the advice set out in the Code of Best Practice for National and Regional Greenways.

## **Other**

13. The applicant shall carry out a climate impact assessment of the proposed development taking into account calculations/ estimations of carbon savings and losses from the construction and operational phases of the eGreenway. Specifically, the applicant shall provide an assessment of the likely carbon release from tree felling vis a vis the carbon sequestering from tree replanting proposals.
14. The Board notes the submission from the Department of Housing, Local Government and Heritage in relation to archaeology. The applicant shall consult with the Department to agree the scope of archaeological testing of the foreshore/ underwater archaeological survey and a programme of archaeological mitigation measures.
15. The applicant shall provide fencing and screening details along the boundary with the property at The Beeches, Annacarney, Vallymount, W91 A2N1.
16. The applicant shall provide a comprehensive and detailed response to any remaining issues raised submissions received by the Board from prescribed bodies and observers (copies attached). In the preparation of this response, and other responses herein, the applicant shall consult with the prescribed bodies as necessary, to ensure that matters raised are adequately addressed.

## **Likely Effects on the Proposed Development on any European Sites**

17. The applicant is referred to the detailed submission on the proposed development from the Development Applications Unit of the Department of Housing, Local Government and Heritage on matters relating to Appropriate Assessment (AA). The Department notes that the eGreenway lies partly within Poulaphouca Reservoir SPA (site code: 004063) and within 500m of the Wicklow Mountains SAC (site code: 002122). The applicant is requested to address the following matters raised by the Department in relation to the AA Screening Report and Natura Impact Statement (NIS) submitted with the application:
  - i. Further consideration is requested of disturbance impacts to Special Conservation Interest Species for the Poulaphouca Reservoir SPA as outlined in the Department's submission and other issues relating to the SPA.

- ii. The Department considers that the proposed project is likely to have significant effects on the Wicklow Mountains SAC due to the presence of otter. A comprehensive otter survey covering all areas within the zone of influence of the proposed development shall be carried out to inform appropriate assessment and suitable mitigation shall be put in place based on survey results, with mitigation by avoidance being the first option.
- iii. Consideration of the impact, if any, of the existing 6km trail in combination with the proposed development, as well as tree felling and tree management activities, placement of rock armour along the shoreline, existing recreational activities, and all other projects and plans in the vicinity of the proposed development.

18. In addition, the applicant shall comment on any other issues raised within submissions relating to the effects of the proposed development of the integrity of European Sites:

**Note:**

Any changes or amendments to the eGreenway project as a result of the applicant's response to items nos. 1 to 18 above shall be reflected and highlighted in the NIS documents.

Any significant changes or amendments to the eGreenway project as a result of the applicant's response to items nos. 1 to 18 above may require the publication of new public notices under the heading Significant Further Information.



## 15.0 Appendix 4 – Summary of Further Information Documents

### 1. Traffic and Transport Assessment (December 2023)

This report concludes by stating that a sustainable access transport strategy identifies that there is limited availability for public transport in the surrounding area, and that WCC will actively promote and support the delivery of national, regional, and local bus services.

The report examines the traffic and transportation system in the vicinity of the eGreenway development works and the potential impacts associated with the operation of the development. It is concluded that sufficient car parking is being proposed and that the road network can satisfactorily accommodate the increase in traffic associated with the operational stages of the proposed development.

### 2. Stage 1 – Road Safety Audit (August 2023)

The Road Safety Audit has been carried out with the sole purpose of identifying any features of the design that could be removed or modified in order to improve the safety of the scheme. Appendix C contains a Road Safety Audit feedback form completed by the designer. All identified problems are accepted along with most recommended measures. For those recommended measures not accepted, alternative measures and described and reasons are outlined for not accepting the recommended measure.

### 3. Quality Audit

The Quality Audit includes a DMURS Street Design Audit, access audit, cycle audit, walking audit and Stage 1 Road Safety Audit (as above). The DMURS Street Design Audit is primarily concerned with connectivity, self-regulating street environment, pedestrian and cycling environment, and visual quality. The access audit identifies a range of barriers that potentially restricts access for mobility impaired road users in the external built environments. Walking and cycling audits provide a number of recommendations mostly relating to widths, obstructions and crossing facilities.

### 4. Technical Note on Parking Arrangements on Blessington Main Street (Jan. 2024)

In developing the facilities for the town centre, dedicated cycle facilities were considered but this was not practical with the existing carriageway cross-section and

would have resulted in large civils works and traffic management to provide the facilities. Shared use facilities have therefore been designed with the desirable minimum width (3m) through the town centre, reducing to 2.5m (absolute minimum) in pinch point areas.

The main impact on the town centre is the loss of parking at Kilbride Road and on Main Street. Five on-street parking bays will be lost which is not considered to be significant in the context of the total town centre capacity of 75 spaces. The town centre will be reviewed as a whole under proposals to develop a streetscape 'Town Centre Regeneration Scheme' in the coming years, and this will identify if any additional parking is required.

#### 5. Outline Management and Maintenance Plan (Jan. 2024)

This plan provides detail on an Operational Management Structure, Greenway Management Duties, Financial Resources, Inspection and Maintenance Plan and Activities, Monitoring, Complaint Management and Resolution, Code of Conduct, Control of Dogs, Water Safety, Operational Hours, Severe Weather Response Plan, Emergency Response Plan, and Trail Accreditation and Insurances

#### 6. Monitoring and Evaluation Plan

The plan will involve the collection of user data to assess demand and where to prioritise investments; aid in the planning and construction of present and future interventions; make the case for new proposals; demonstrate and quantify the economic benefits of the interventions; and communicate the long-term community gains.

#### 7. Car Park Drainage Summary

Over the edge drainage is proposed for the greenway, where the runoff is collected in a ditch and then discharged into the lake. Channelized flow down the embankment without sufficient protection will be avoided and suitable measures will be put in place to protect from scour. A crossfall of no more than 10% is proposed along the cycleway so as not to destabilise the cyclist.

#### 8. Spatial Extent of Habitat Lost & Woodland Restoration

Spatial Extent of Habitats:

- Built/ bare ground – no compensatory measures needed.
- Woodland and wet woodland – native woodland species mix proposed and enhanced by wildflower. Compensatory woodland will be considered for the specific hydrological, shading and conditions of each establishment area. Each of the trees to be lost will be replaced by native broadleaved trees – approximately 7,265 trees removed to be replaced by 2,300 trees along the route (one tree every 10m), 4,965 trees in land parcels with WCC's ownership, and additional trees within parcels owned by ESB that have suffered wind damage (3,300 trees). Loss of 11 ha of woodland will be adequately compensated to ensure 'no net loss' of biodiversity.
- Approximately 27% of the 3.5 ha of grassland to be removed is of low ecological value. Species rich grassland generally found along shoreline and around river floodplains which are outside the works area.
- Total area of wetlands within the works area is 0.05 ha. An area of 0.04 ha of marsh habitat will be removed which is not considered significant. Greenway generally avoids areas of wetland habitat.

#### Habitat Restoration:

- Important mature trees of high conservation value or with habitat value for bats, birds and mammals including pine marten and red squirrel will be retained where possible.
- Protection and avoidance of areas of high-quality habitat.
- Establishment of new habitat areas as detailed in the landscaping report.
- Actions proposed to enhance the biodiversity value of retained woodland include scrub management; management of invasive species; retaining deadwood and habitat piles; creation of standing deadwood, veteranisation and managing ash dieback; selective felling; understorey and woodland edge planting; conservation grazing; and grassland restoration and enhancement.

## 9. Bat Report

Common pipistrelle, soprano pipistrelle, Leisler's bat, and Daubenton's bat were identified during bat transect surveys and all four species are common and have

widespread distribution. The removal of tree and shrub species will result in the loss of foraging and commuting habitat for bats. Provided that the proposed development is constructed and operated in accordance with the design, best practice and mitigation described in the bat report and the project EclAs, significant effects on bats are not anticipated at any geographic scale.

## 10. Fauna Report

Mammal surveys carried out in November 2023 sought field signs and refugia of protected species. The surveys for Badger recorded a number of setts, one of which is within the footprint of works and a partial exclusion of this sett and construction of an artificial sett is recommended.

A single Otter holt was found within the zone of influence although outside the footprint of the scheme. A range of mitigation measures are recommended that will allow this holt to be retained without significant impact during construction. No operational impacts are predicted.

A number of Red Squirrel dreys were recorded and works should avoid the trees in which these are located. Where this is not possible, these trees should be felled under licence outside the squirrel breeding season.

Trees offering suitable habitat for pine martin should be retained and areas suitable for breeding by amphibians should not be disturbed between December and May. No Marsh Fritillary larval webs were found.

## 11. Annex I Habitats and Rare Flora

Targeted habitat and botanical surveys were carried out in the proposed development footprint in areas exhibiting high-quality examples of semi-natural habitats, including wet woodland, calcareous grasslands, wet grasslands, exposed sands, gravels, or tills, and rare, threatened and red-listed plants.

A section of grassland corresponds to Annex I semi-natural dry grassland and scrubland facies on calcareous substrates 6210. This section of grassland is not within the greenway footprint, but measures should nonetheless be put in place to prevent damage during construction. The second most species-rich grassland lacks positive and high-quality indicators for Annex I type but boast diversity and anthills. A small section will be impacted, and a grazing management plan should be drawn up.

No woodland habitat surveyed aligned with alluvial woodland (91A0 and 91E0) based on the site characteristics and the absence of a sufficient number of both target and positive indicator species. The proposed development has avoided any areas of wet woodland for biodiversity and engineering reasons. It is stated that mitigation measures to prevent impacts to woodland should be set out in the CEMP.

Springs and seepages were generally rare around the reservoir except in the Baltyboys route section, where five springs/seepages were identified within a 600m extent. None of these conform to the Annex I habitat 7220 Petrifying springs with tufa formation (Cratoneurion), as no high-quality indicator species were found. These springs and seepages are still habitats of high local significance and works should aim to avoid adverse impacts to their hydromorphology, habitat conditions and water quality.

## 12. Landscape Plan

The landscape plan and management and maintenance actions necessary to protect and enhance the landscape and biodiversity along the eGreenway are set out to include details on planting species mix for each of the landscape typologies along the route. The management and maintenance actions have been developed with reference to the All Ireland Pollinator Plan (AIPP) 2021-2025. Planting proposals are illustrated for farmland landscape, the land shore, mixed woodland, rural road landscape, and open space landscape. Management and maintenance operations after completion of the proposed development are required to provide a framework for the long-term management of the greenway and to allow planting treatments to flourish and reach their design potential. Proposed planting includes native woodland, wildflower, bulbs and grasses.

## 13. Proposals for Monitoring Bird Disturbance

This document proposes a programme of monitoring of bird disturbance following the opening of the greenway. An overall survey effort of 16 hours per month is proposed and methodology should be submitted to Birdwatch Ireland for their review prior to this being initiated. It is recognised that a wide range of human activity, including recreational pursuits and commercial activities may disturb protected birds (Goddard et al, 2022).

## 14. Public Consultation and Communication

Many of the consultation events occurred prior to the publication of 'The Strategy for the Future Development of National and Regional Greenways,' which was released in July 2018. The consultation and information events included a feasibility study (2010), Part VIII statutory consultation (Ref: 17/307), engagement with local community groups, formal council meetings, establishment of a greenway project board including local community representative, project progression updates within WCC newsletter, landowner engagement, appointment of project liaison officer, initiation of community working group (March 2023), and promotion of greenway on social media.

#### 15. Climate Impact Assessment (Jan. 2024)

The climate change risk (CCR) and adaptation assessment illustrates that climate change risk does not present a significant risk to the proposed development. The embedded controls in the design, construction and operation of the asset mean that the risk profile only contained low and medium risks. Therefore, it is concluded that climate change risk is 'not significant' for the proposed development.

The total GHGs from constructing the proposed development are estimated to be 24,890 tCO<sub>2</sub>e, although 17,753 tCO<sub>2</sub>e of this can be attributed to the release of carbon from the trees being removed from site. As all removed trees are being replanted, this is anticipated to be recouped throughout the lifetime of the replanted trees. The net GHGs (including all GHG avoidance deductions) from operating the proposed development over its (at least) 25-year life are estimated to be 103,080 tCO<sub>2</sub>e, which is proportionally small in the context of Ireland's national carbon budget.

#### 16. Briefing Note on Archaeological Mitigation

Documentation forwarded to the DAU for review only provided a summary of the Archaeological Impact Assessment within an EIA Screening rather than the full AIA itself. The Briefing Note was prepared in response to the consultation meeting which clarified the issues raised by the DAU and includes a mitigation strategy for cultural heritage.

#### 17. Response to ABP Submissions

See Appendix 1.

#### 18. Appropriate Assessment Screening and Natura Impact Statement

The Screening Report concludes that impacts to the Poulaphouca Reservoir SPA as a result of the Proposed Development construction cannot be definitively ruled out. A possible risk of temporary pollution to the reservoir exists during the construction phase of the proposed development. Temporary disturbance impacts to Otters are also possible. It is therefore concluded that a full Appropriate Assessment is required.

The NIS concludes, in light of the objective scientific information, that, when mitigation measures are correctly implemented, the project, individually or in combination with other plans and projects, will not have an adverse effect on the integrity of the Poulaphouca Reservoir SPA, in view of its conservation objectives and in view of best scientific knowledge.

## **16.0 Appendix 5 – Responses by Third Parties to Applicant’s Further Information Submission**

Following publication of new notices, submissions or observations in relation to the further information were received from the following third parties:

### *1. Aine Ascough, Sroughan*

- Endorses all the points in the submission made on behalf of Carmel Ascough.
- Requests oral hearing given the extensive nature of observations to date.
- Requests the Board to reject the proposal in light of the major deficiencies in the information provided by WCC and the failure to rectify these deficiencies.

### *2. Aine Burns, Ballyknockan*

- There is a need for development in West Wicklow but has concerns about existing parking capacity and parking proposals.
- Eco toilets should be considered such as those at Donadea Forest and local proprietors should be approached about the use of their toilets.

### *3. Aine Butler, Valleymount*

- Objects to proposal for reasons relating to traffic lights on bridges, car access, bridge condition and width, car parking, impact on environment and wildlife, runoff from amount of tarmac, and impact on Blessington Main Street.

- Questions use of data from Waterford greenway when Blessington is much closer to Dublin.
- Concerns regarding community consultation, toilet facilities, disability access, and management proposal.

*4. Aine Moran, Butterhill*

- Supports the proposed development for its potential to attract tourism, boost the local economy and promote health and wellbeing.

*5. Aisling Giltrap Mills, Glashina*

- Objects to traffic lights on bridges and notes that boardwalks were originally proposed.
- Local businesses should not be expected to let people use their toilets, and some do not open early or every day.
- Objects to cycle lane from Kilbride Road along Main Street and impact on businesses on that side of the street.
- Greenway will be good for the area if all aspects of it are done correctly.

*6. Alan Cowie, Kilbride Road*

- Could be a wonderful amenity but has concerns about width of footpaths, cycle lanes and traffic lanes, particularly at bridges; bridge measurements, parking surveys; intermingling of pedestrians/ cyclist with traffic; proposals for bridges; tunnel at Russborough House; lack of toilets, no proposals for lakeshore quality assessment; and no provision for any value for money audit of plans and completion.
- Boardwalks should be installed at bridges and along the N81 at Burgage.
- More of proposed greenway will be in forestry – more lakeshore viewing windows would add interest.

*7. Alan Stanley, Ballyknockan*

- Objects to the application for reasons relating to traffic lights, lack of toilet facilities, traffic impact and parking provision, environmental impacts, and tree removal.



- Environmental report for nearby substation states that the foraging range for greylag geese is 15-20km.
- A hard packed path meandering along the shoreline with enough room to pass is all that is needed initially, and some population areas could be improved as necessary.

*8. Alana Wilhelm, Lacken*

- Supports greenway for its potential to attract tourism, impact positively on the local economy, and promote health and wellbeing.

*9. Alison Kiernan, Main Street, Blessington*

- No objection to greenway but has reservations in relation to design process and route choice.
- Profiles/ sections should show further detail in town centre including pinch points – width of footpath is only 2.5m and more detail needed on how risk of collision will be mitigated. Waste bins will also create further pinch points.
- Yellow box at archway on Main Street not included – questions if detailed survey was carried out along the route. Wheelchair access spaces, parking and ambulance spot should also be detailed.
- Consideration should be given to dismount signage.
- There may be risk of undermining buildings on Main Street from 300mm excavation works.
- There is an alternative route through council lands past the town parallel to the lake.
- Proposed greenway should be aligned with proposal put forward by Blessington Town Centre Regeneration Scheme.

*10. Andra Johnston, Blessington Manor*

- Supports greenway for its potential to attract tourism, the positive impact on the local economy, encouragement of investment in local infrastructure and amenities, and promotion of health and wellbeing.
- Work needs to be done with respect to the bridges, and the proposed dual cycle/ pedestrian path in the town.

*11. Andrew & Leone Hogan, Rockypool Villas*

- Concerns about impact on their property and immediate vicinity, in particular access to driveway; drainage arrangements; traffic implications and increased volumes of cars, pedestrians and cyclists; invasion of privacy; lack of consultation; and removal of parking on Blessington Main Street.

*12. Ann Mooney, Baltyboys*

- Concerned with the likely effects on the environment of Blessington Lakes with respect to white clawed crayfish, greylag goose and lesser black-backed gull, which have been seen nesting in Valleymount and other areas around the lake.
- Construction of greenway will have a devastating impact on habitat for protected species.
- Runoff from asphalt can cause serious toxicity to water and water quality will not be of a standard to sustain wildlife and would be a major concern for the supply of drinking water.
- Mature trees such as chestnut, sycamore beech and ash, all 60 to 80 years old will be destroyed, ensuring loss of habitat and food source for wildlife. WCC are replanting trees in an area where there already are mature trees.
- Excavation needed to take out 36,000 tonnes of earth and to bring back 56,000 tonnes of material is enormous and construction phase impacts will be disturbing to the local community.
- Concerns regarding proposals to use existing toilet facilities in pubs.
- Concerns regarding littering and dogs.
- Concerns regarding traffic lights on bridges, footpath width, safety and security and time delays.
- Existing parking spaces are being used for other purposes.
- Objects to proposal to remove parking on Blessington Main Street and the sharing of the pathway.

*13. Ann Murphy & Gerard Cruise, Main Street*

- Concerns relate to the proposed stretch of shared cycle & pedestrian pathway running from Kilbride Road to the end of Main Street.

- Greenway would cross entrance at horseshoe arch that is in constant use and proposes removal of yellow box.
- Width of shared pathway will only be 2.5m and this section of Main Street is already busy – there are health and safety concerns.
- There will be significant impacts from removal of car parking spaces along this section of Main Street.
- Toilet proposals in Blessington are inadequate.
- Groundworks may impact on structural integrity of buildings on Main Street.
- Alternative route options to avoid Main Street suggested.

*14. Ann O'Sullivan, Woodend, Naas*

- Proposed development contradicts the Wicklow County Development Plan, 2016-2022 which states that *"tourism assets will be managed in a sustainable manner to protect against any detrimental impacts on the environment and local communities."*
- Proposal will have a significant adverse effect on the environment from increased human activity, effects on bats and qualifying interests of the SPA, felling of trees, development of 9,000 sq.m. of parking and 33km of roadway (130,000 sq.m. of tarmac), and consequential runoff of hydrocarbon pollution into the reservoir.
- Little detail on compensatory planting and no evidence of the effectiveness of such a measure – tree felling likely to give rise to significant medium and long term negative impacts adjacent to a highly sensitive receiving environment. New planting will do nothing to offset carbon sequestering shortfall and replanting at Knockieran is not possible unless existing trees are removed.
- No EIAR submitted despite the proposed development running through and taking 1 hectare of the SPA.
- Irish Water and Dublin City Council are concerned about impact on water quality – this has not been adequately addressed in further information response and no mitigation proposed.

- Narrowing of three bridges to one lane is a step too far and damaging impact of 300,000 tourists per annum on the protected environment of the reservoir has been underestimated.
- 50,000 m<sup>3</sup> of rock armour is an environmental hazard and visual intrusion on this area of scenic beauty. Submitted drawings now show a significantly increased amount of rock armour encroaching into the SPA.
- Impacts (set out in other submissions) disproportionately outweigh any benefits accruing from the proposed development and hydrocarbon run-off is a real concern. Absence of aquatic survey casts serious doubt and White Clawed Crayfish is present in the reservoir.
- Greenway will impose a ring of steel around the lake that wildlife and wildfowl will need to cross, making them vulnerable to predation.
- No noise surveys were conducted.
- NPWS has not yet produced site specific conservation objectives for the Poulaphouca Reservoir SPA – impossible for the Board to carry out AA. Proposed mitigation measures do not meet the standard of scientific certainty required, e.g., impermissible to complete CEMP post consent.
- EclA does not identify who carried out bat surveying or assessment – survey of 7,000 trees is a huge task and there is no evidence that this has been done. No map has been prepared to identify roost trees. Mitigation is ineffective given the strict protection afforded to the species under the Habitats Directive.
- Board is required to direct the preparation of an EIAR pursuant to Section 50 (1)(d) of the Roads Act, 1993. Application should be made under Section 177AE(15) or under the Roads Act, 1993.
- Non provision of public toilets is contrary to the Guidelines for Greenways and Cycle Routes Ancillary Infrastructure which states that *“route users should, at the very least, have access to a toilet facility at major trail heads. Existing toilets on or close to the route should be indicated on map-boards and signs on the trail.”* This could result in an unacceptable level of untreated wastewater/ sewage runoff into the reservoir.

- Entire greenway could be constructed on or adjacent to the existing public roadway that encircles the entire greenway.
- Proposal does not form part of the National Cycle Network and will not form a link with any other such development and is therefore not supported by national policy.

*15. Anna-May Woods, Ballymore Eustace*

- Supports the proposed development for its potential to attract tourism, boost the local economy and promote health and well-being.

*16. Aoife Brennan, Downshire Park*

- Supports the proposed development for its potential to attract tourism, boost the local economy and promote health and well-being.

*17. Aoife O'Neill Hill, Blessington Orchard*

- Objects to proposed removal of car parking outside doctors' practice and traffic lights on bridges.

*18. Assumpta Byrne, Manor Kilbride*

- Objects to proposed changes to bridges, roads, livelihoods and safety of local population and visitors.
- Most cyclists using the greenway will transport bikes on their cars to Blessington, then cycle.
- Public funds would be better spent making other tourist roads safer.
- Proposed changes to Blessington, the bridges, the main street and parking will make the town hostile for socialising and shopping.
- Boardwalks would solve the problem at the bridges.

*19. Audrey McDonald, Valleymount*

- Objects to greenway including traffic lights and lack of infrastructure, including parking, toilets, bins, etc.
- Proposal will impact on wildlife and cause noise pollution.

*20. Ballymore Eustace Community Development Association*

- Welcomes the proposed development as being of huge benefit to West Wicklow.
- Bohernabreena and Vartry gained some recreational capacity, but Blessington Lakes was made largely inaccessible despite being in public/ semi state ownership.
- Greenway is way of capitalising on stunning location and economic positives come with beautiful setting rather than building 1000s of houses.
- Country is undergoing huge change on transport decarbonisation and modal shift.
- People will stay over in lakeside locations to do the full loop and spend in local businesses without having to move to the next linear location.
- Greenway will cater more for families, kids on bikes, tourists, sightseers, slow cyclists, walkers and hikers – road cyclists will continue to feature on roads.
- Idea of shuttling at bridges is not something to create anti greenway sentiment – shuttled bridges work fine in other locations.
- Construction management plan linked to environmental and biodiversity needs to be a key pillar.
- Tree boundary around the lake is of a commercial nature with little biodiversity value – trees should be removed sensitively.
- There needs to be forward planning and maintenance with strict protocols – no undesignated camping, no fires, no BBQs, litter maintenance, etc.
- Lakes are manmade industrial features of a Liffey past and project gives some of what was originally taken in the 1930s & 1940s back to local communities.

#### *21. Barry Dalby, EastWest Mapping*

- Proposal requires a different level and type of appraisal than other greenway projects.
- Relatively modest proposal has morphed into a fully specified greenway, which is inappropriate for this location – it is overengineered and consequences will be far more impactful in terms of tree removal, and actual construction work.

- There are significant local concerns on traffic management, loss of parking and increased traffic, litter and wild camping.

*22. Barry Kinane, Valleymount*

- Objects to proposal for reasons relating to lack of consultation, traffic management, lack of public transport, environmental impact and toilet facilities – uphill walk from greenway to any of the public houses is at least 10 minutes.
- Greenway will encourage anti-social behaviour and there are concerns about ongoing costs.

*23. Bernadette Hennessy, The Office Shop, Main Street*

- Business owner concerned about parking in the town, lack of toilets, and lights on bridges.

*24. Bernadette Kavanagh, Rockypool Crescent*

- Concerns about lack of consultation, traffic safety at Rockypool Villas, removal of town centre parking, traffic lights at bridges, bridge condition, and privacy.

*25. Bernadette Moran, Ballymore Eustace*

- Concerned about lack of toilets, lack of parking, proposed traffic lights on bridges, and proposed shared paths/ cycle lanes through Blessington village.

*26. Bernie Kavanagh, Baltyboys*

- Objects to the proposal for reasons relating to the traffic lights on bridges, no toilet facilities planned, felling of trees, impact on protected species in the lake from pollution, no visual impact assessment, potential for increased crime in the area, increased rubbish in the area, and the link road to Tulfarris.

*27. Blessington and District Forum, c/o Ms. Carmel Cashin*

- Fully in favour of initiatives which promote local development with its attendant employment, commercial and societal benefits.
- Upgrade and amalgamation of the 6.5km Phase 1 length of greenway is welcomed.
- There continues to be concern regarding the lack of public consultation and communication by WCC, traffic management on bridges, general traffic

analysis, boundary fencing adjacent to farmland, removal and replacement of trees, toilets along the 33km route, and ongoing management.

- Oral hearing should be held.

*28. Blessington Family Practice, Main Street*

- Dedicated ambulance space and car parking would be eliminated to the front of the practice and there will be ongoing risks of collision between greenway users and patients.
- Proposal will also see the removal of disabled parking outside Crimmins Butchers – this space should be relocated immediately south of ambulance space.
- Greenway traffic would present obstacles to patients and potential hazards - greenway should be diverted past Blessington either along lake side or other side of Lower Main Street.
- Cannot be regarded as proper or sustainable development for WCC to disrupt longstanding medical practice in the manner proposed.
- Negative environmental consequences would flow from the proposed development at Lower Main Street, including cluttering of e-bikes and their users, littering, dog fouling, etc.

*29. Bradley Foster, Ballyknockan*

- Objects for reasons relating to traffic surveying, traffic management, toilets, consultation, fencing, car parking, emergency access, traffic lights on bridges, removal of disabled parking in Blessington, and access to Tulfarris.

*30. Brendan Hughes, Baltyboys*

- Objects to the greenway for reasons relating to the proposed link to Tulfarris, traffic lights on bridges, and lack of toilets.

*31. Brian Hennessy, Dunlavin*

- Objects to the proposal as Poulaphouca Lake is classified as an SPA and planned rock armouring will involve an enormous amount of construction work,



which will have environmental effects on protected wildlife habitat and aquatic wildlife. It is also unsightly and potentially dangerous terrain.

*32. Brian Kingham, Baltyboys House, c/o Ivor Fitzpatrick & Company*

- Baltyboys House and demesne landscape is unique, visually vulnerable and ecologically sensitive, and is a heritage of national and international importance.

***Misdescription of the Proposed Development***

- Proposed development falls within the definition of a public road as defined in 1993 Roads Act – information provided to the public does not reflect the true nature of the proposal. Documentation is also silent on the extent of vehicles that will be permitted on this public road and the limits and extents of the proposed development are vague, ambiguous and incapable of being the subject of an assessment of the type required.

***Designations Wicklow County Development Plan***

- Site is highest designation possible in the Wicklow County Development Plan and proposal is for the construction of a road along the boundary of one of the most sensitive areas within the high amenity designated area.
- Proposal includes a major bridge described in drawings as being “subject to separate Section 50 approval process” – level of detail and the inadequacy of design make any submission in terms of its effects impossible. Design appears to be no more than a concrete portal frame type structure with excessive engineering that could never be deemed consistent with amenity designation.

***Incomplete Design***

- Inconceivable that the board could approve a scheme with a design of a bridge in sketch form – Board will be acting in excess of its jurisdiction if it were to permit such a scheme and would be in breach of both the EIA Directive and the Habitats Directive. Board must have an appropriate level of detail to comply with 92/43 EEC.
- Inadequacies include failure to carry out hydraulic assessment, hydraulic and storm flow rates, foundation details, stability and viability of side slopes, hydraulic impact of new bridge relative to existing bridge, structural integrity of existing bridge and retention of embankments, abutments and supporting

columns, potential, undercutting, undermining and degradation arising from new bridge, and flow capacity flood risk.

- Failure to identify this new bridge in the public notice in terms of public consultation and potential impacts on receiving environment. Lack of any reference to a bridge is a very serious and indeed a fatal omission.

### ***Habitats Directive***

- Inconceivable that the proposed bridge and its proximity to the reservoir could ever be compatible with, or show as a matter of scientific certainty, that it will not affect the conservation objectives of the site - about 5% of the works will encroach directly on the water body.
- SCI bird species would be affected during construction, in terms of its disturbance with high levels of noise, dust, traffic and general disturbance – Not a question of absence of impact, but rather certainty of impact, which in itself would necessitate a refusal.
- There are deficiencies, inadequacies and incompetence in the design submissions for the entire system of culverts and cross river systems – Box culverts appear to be of standard design and the Courts have consistently held that the obligation is to show all structures. There is also complete confusion as to the number of culverts and the absence of detail in the design.
- There appears to have been no ground investigations carried out, which is standard practise for road schemes of far less environmental significance.
- This is not an appropriate location for a public road of 33 kilometres with major infrastructural works over watercourses and including 13 to 18 culverts.
- Development will be created that will perpetuate erosion to a scale that requires the most intrusive intervention, namely, the extraction and construction of rock armour along extensive sections of the lakes. This amounts to a material contravention of the Development Plan in view of the objectives of the plan to protect the visual amenity of the area, protect its scientific and ecological integrity as a European site, and to protect its status as a drinking water source for Dublin.

- Difficult to conceive where over 3.5 kilometres of rock armour will be installed within the European site, the source of the rock, the degree to which the nature of the rock is compatible with the existing ecological environment, and the degree to which the imposition of such heavy volumes of rock will change the character of the water body. Proposal appears to be purely structural engineering based, without any understanding of the obligations under the Habitat Directive, WFD, Planning Act or other environmental legislation.

***Qualifying Interest, Greylag Goose and Lesser Black Backed Gull***

- Request for additional information under this heading has not been adequately addressed. There is no evidence provided, scientific or otherwise, to show that the applicant identified, analysed and made complete precise and definitive findings and conclusions capable of removing all scientific doubt about the protection of the qualifying interests of the SPA. Ornithological report should have formed the basis of the FI response.
- Applicant makes no recommendations as to what remedial action they would take if a negative impact occurred.
- Applicant states that species of conservation interest were not recorded or monitored for the purposes of the application, as the surveys were carried out during the months of August and January. Not acceptable to state that the risk of impact is not considered significant without definitive scientific evidence. Little consideration of impact during construction and operational phases and to habitat destruction and interference or disturbance of SCI species or other waterfowl/ wildfowl species.
- Applicant concedes that disturbance may result in changes to foraging locations, changes in breeding behaviour, reductions in roosting times at particular locations, and even changes to migration routes – AA should assume as a minimum that an objective is to ensure that species are not significantly disturbed. No foraging or roosting locations were identified in surveys.

***Poulaphouca Reservoir SPA (Site code: 004063)***

- WCC has totally underestimated the importance of the SPA as a national and international resource for the species of conservation interest. Numbers of greylag geese have declined substantially on the reservoir over the past 20

years and the primary reason for this decline is disturbance and adverse impacts. Potential disturbance was accepted as a significant contributing factor for their decline in O'Sullivan V ABP. Additional disturbance on the SPA will exacerbate further decline in numbers.

### ***Environmental Impact Assessment***

- Proposed development must be described as comprising a public road and what is therefore characterised as a greenway would appear to be common case for "road" for the purposes of the EIA directive.
- EIA Screening Report does not consider Schedule 5 Part 2 paragraph 10(dd) of the Regulations – all private roads which would exceed 2000 metres in length. Road is defined as any street, lane, footpath or passage and includes any bridge, viaduct, underpass or overbridge and includes with regards to Section 68 of the Roads Act, a cycleway. Board recently accepted that Kerry Greenway was a road. Proposed development requires a mandatory EIA.
- Bridge over Annacarney Stream has not been properly considered as sub-threshold development. Car parks in their own right should also be considered a sub-threshold development. Manner in which sub-threshold development is assessed relative to the significant effects in the environment is not carried out in a manner consistent with the EIA Directive.
- EIA Screening Report does not properly consider the characteristics of the proposed development, including considerable excavation, filling of material and reduction of compacting and hard surfacing, and removal of over 7000 trees.
- Plans not clear on rock armour installation, the source of this material, the manner in which it is to be transported and installed, and the effects on the protected site invalidate the exercise and could never amount to a preliminary examination for the purposes of EIA. Hydrocarbon pollution is also contemplated, but it is still concluded that the proposed development is unlikely to have a significant effect, such as to warrant EIA.

### ***Likely Significant Effects***

- Failure to engage with the issues required to be addressed in the Habitats Directive fails to address in any practical and appropriate manner the

obligations under the EIA Directive – no reference in the EIA report to the findings in the NIS.

- Inappropriate for WCC, for the purposes of EIA Directive to deal with a screening for EIA in the way that they have done in respect of their own development. WCC appear to apply Schedule 7 of the Regulations but when they come to the identification of thresholds, they ignore Schedule 5.
- Should be concluded that the scheme is capable of having a significant effect in the environment and falls within the class of development to which an EIA applies, and therefore requires a mandatory EIA. Board must reject this application on the basis of its failure to properly consider and address the EIA Directive.
- Fundamental part of EIA procedure is to identify alternatives and in particular alternative routes for a scheme such as this, and to select an option based on environmental considerations. Other alternatives might be the method of surfacing or the type of bridge, e.g. wooden.

### ***Miscellaneous Matters***

- Traffic lights at bridges totally unacceptable to the majority of residents in the area. There will be environmental damage, traffic hazard and congestion from this arrangement.
- Absence of toilets on a greenway is likely to cause significant dis-amenity. One must consider if it is appropriate to bring this volume of people so close to such a source of water supply. Absence of toilets is contrary to the Guidelines for Greenways and Cycle Routes, Ancillary Infrastructure.
- Any public road remains in the ownership of the adjacent owner on either side of that road.
- No definitive line on any of the submitted drawings to indicate the boundary of the SPA – Impossible to tell where the proposed Greenway encroaches on the SPA.
- Erosion protection of the reservoir shoreline is the responsibility of the ESB, not WCC.

- Privately commissioned ornithological survey attached recordings sightings of Greylag geese and Lesser Black-backed gull on the reservoir for the 2022 to 2023 season. Over 1000 lesser Black-backed gulls were sighted to the north-east of Valleymount Bridge on the 28<sup>th</sup> October 2022, and on the 16<sup>th</sup> January 2023, 1,100 Lesser Black-backed gulls were observed in approximately the same location.
- Recreational disturbance impacts have not been adequately addressed. There are no definitive or appropriate recommendations put forward to mitigate disturbance to wildlife and habitat for any species of bird or mammal.

### ***Protected Species under the EU Habitat Directive***

- Bat species are likely to be present within the proposed development's zone of influence. Ecological Impact Assessment acknowledges that significant effects on bats are likely. EclA does not identify who carried out bat surveys or what methodology was used. Effects on bats can only be mitigated by avoidance, given that individual specimens and roosts are protected.
- No evidence in survey material to identify where or how many trees were surveyed or inspected, and not one bat roost was identified. Chosen transept locations are not a true reflection of the type of topography or landscape through which the greenway will primarily traverse. No evidence to show that old boathouse or undersides of bridges were inspected.

### ***Aquatic Survey***

- No aquatic survey was submitted.

### ***Hydrocarbon Pollution***

- Proposed Greenway will include 128,000 sq.m. of tarmac, a third of which will be directly adjacent to the shoreline, with no curbing, riparian margins or buffers to prevent direct run off into the reservoir. Only method considered to alleviate hydrocarbon run off into the reservoir will be at the construction phase of the project.

### ***Public Consultation***

- Those in attendance at public meeting on the 30<sup>th</sup> May 2024 were unanimous in the view that there was a dearth of public consultation related to this application.

- Observations in favour of the Part VIII application made in 2017 should not be taken as a measure of support for the current application.

### ***Sustainable Development***

- Proposal directly contradicts the objective of the Development Plan, which states *“tourism assets will be managed in a sustainable manner to protect against any detrimental impacts on the environment and local communities.”*
- Access to the proposed Greenway by public transport is unimplementable aspiration.
- Sustainable option would be to upgrade the existing road, making it safer for pedestrian, cyclists and the disabled and avoiding the need for the proposed greenway.
- Application for this development should be refused consent, and in the event that it was to be considered further, an oral hearing is requested.

### ***33. Brian Miley, Baltyboys***

- Objects for reasons relating to lack of consultation, road safety concerns, impact on farm on L8360, traffic lights on bridges, and lack of facilities.

### ***34. Brian Murphy, Ballymore Eustace***

- Supports greenway as benefiting community and surrounding area.

### ***35. Brian O'Meara, Ballymore Eustace***

- Supports greenway for its potential to attract tourism, improve the local economy, encourage further investment, promote health and wellbeing and foster connection with nature.

### ***36. Cara Hennessey, Naas Road***

- At the outset, people welcomed the greenway but are now starting to see the project as a huge disruption to their everyday lives due to traffic lights on bridges, lack of parking and toilets, impacts on drinking water, and conflicts on Main Street.

### ***37. Carmal A. Larkin, Baltyboys Upper***

- Has concerns relating to the cycle route along Main Street and the idea of traffic lights on bridges.

*38. Carmel Ascough, FP Logue Solicitors*

- **Absence of consultation with local residents and landowners** – meeting between WCC and objector came too late in the process for its outcome to be embodied in the scheme. Similar conversations would need to be opened up with all other landowners around the lake.
- Sheep kills, as happened near the lake, would be greatly increased with the greenway present unless ESB fences were replaced.
- More than one discrepancy between land registry map and the outline of ESB-owned lands illustrated on land ownership maps in RFI – series of registered land boundary corrections need to be made with individual landowners, including objectors.
- **Access to application file** – rules on public participation have not been followed by either the Board or Council and public participation has been undermined through defective notices and the failure by the Council and the Board to make all of the relevant information available electronically on the websites mentioned on public notices.
- Section 175(5) – public given notice of significant further information under Section 175(5) of the Act and this provision only applies where an application is accompanied by an EIAR.
- **EIAR required** – Original EIA Screening Report (Dec. 2021) is now out of date given the significant further information on file, e.g. original screening refers to WFD data that is now out of date and does not take account of change of surface materials and new and updated local and national climate action plans.
- Mandatory EIA required as a private roadway greater than 2000m and urban development greater than 20ha outside business districts and built-up areas. Forestry Regulations, 2017 make EIA mandatory for forest roads greater than 2000m in length. Original screening report mistakenly applies thresholds set out in Roads Act and appears to ignore the threshold for urban development. Even if project was considered sub-threshold, it is manifest that there are likely significant effects on the environment.



- Proposed greenway involves significant carbon emissions, large increase in vehicular traffic, an increase in 300,000 visitors and possibly more to a sensitive rural area, development taking place around a large lake and SPA, a reduction in size of the SPA through removal of habitat, felling of more than 7,000 trees over 11 ha, removal of 1 ha of wet woodland, and extensive installation of rock armour in the SPA. There will also be significant effects on bats and on the SPA. There is uncertainty on the amount of waste, effect on protected species, water quality and drinking water. Not all of the quality elements required by the WFD have been quantified and Archaeological Impact Assessment is not on the planning file – Board is required to have all relevant information to make screening determination. NIS also refers to iWebs data without details of the data itself.
- **Drinking Water Directive** – concerns about pollution stemming from run-off from asphalt surface introducing hydrocarbons, heavy metals, microplastics, raw sewage, excrement and urine from dogs and significant littering. There is no assessment of the likely effects on drinking water in the RFI.
- **Water Framework Directive** – Competent authority is required to refuse authorisation for a project where it may cause deterioration of the status of a body of surface water or where it jeopardises the attainment of good surface water status or of good ecological potential and good surface water chemical status. Competent authority is required to carry out an independent assessment of the project and to provide reasoned decisions that the project will not entail a breach of Article 4 WFD.
- If competent authority decides to grant permission for project that involves discharges to a waterbody that is liable to cause water pollution, Regulation 7 of the Surface Water Regulations requires it to lay down emission limits. SuDs is an identified mitigation measure, but this does not remove requirement for scientific assessment under Article 4 WFD. No SuDs measures are proposed in this case with surface water draining directly into the lake and no mitigation is proposed to treat run-off during the operational phase. Urban run-off contains pollution and suspended solids.
- Information provided by the Council does not demonstrate that the project is compatible with Article 4 WFD – there is virtually no data or characterisation of

potentially affected waterbodies, nor objective characterisation of potential effects including pollution from run-off and forestry activities and hydromorphological change. There are gaps in the characteristics of the waterbody published by the EPA and compliance with the WFD is impossible to assess. There have been recent severe algal blooms, and this has made conditions for the survival of trout in the lake more difficult.

- WCC has not responded to Dublin City Council and Irish Water's concerns regarding drinking water. Response to Item 10(ii) of the RFI only mentions the concerns of DCC and makes no reference to the comments of Irish Water.
- **Habitats and Birds Directive** – Poulaphouca Reservoir SPA does not have site-specific conservation objectives and AA cannot therefore be carried out since Article 6(3) of the Habitats Directive requires the assessment to be done in light of the site's conservation objectives.
- Documents prepared by the WCC only deal with two species for which the SPA was designated and do not deal with the full range of species significantly present on the site. The occurrence of other species worthy of protection must not be neglected. It would be contrary to Article 4(4) of the Birds Directive to allow habitats of other species worthy of protection within an SPA for which the SPA was not designated to deteriorate for no particular reason. Protection measures which disregard the ecological needs of other species worthy of protection in SPAs would not fulfil the minimum requirements of the precautionary principle.
- There are nationally significant numbers of Shellduck and Gadwall identified in iWebs data.
- Zone of influence is not identified within the NIS, nor methodology for determining it. iWebs data shows observations of Lesser Black-backed gull south-west of Baltyboys-Bloshina Bridge to Phoulaphouca Dam and Valleymount, which are close to the route of the proposed development.
- AA Screening Report says there will be no disturbance or disruption during peak usage but doesn't rule out disturbance or disruption at off-peak times.

- Fact that WCC has proposed a post-consent bird disturbance monitoring program appears to accept that there will be disturbance or scientific doubt – this has been pointed out by DAU but inconsistency has not been resolved.
- Site-specific CEMP post-consent is impermissible in an appropriate assessment.
- AA Screening and NIS only present conclusions or refer to data that is not included on the file and field surveys do not conform to any known methodology.
- **Climate Change** - Cycling project being advanced which entails increased carbon emissions and very significant adverse effects on the environment.
- IEMA Guidelines “Assessing Greenhouse Gas Emission and Evaluating their Significance” have been misapplied – applicant’s Climate Impact Assessment compares project GHG emissions to the total national carbon budget and has not looked at sectoral budgets, how much of the budget is left, and whether transport emissions reductions are below or above target.
- Proposed development will increase vehicle kilometres quite significantly – 90% of visitors will come by car. 2024 Climate Action Plan aims to reduce total vehicles kilometres by 20% by 2030.
- Transport assessment only refers to “car arrivals” and therefore only reports 50% of the trips that will be generated.
- Project does not form part of the National Cycle Network and is therefore not supported by national policy aimed at developing sustainable transport.
- Climate Impact Assessment does not mention WCC’s Climate Action Plan adopted in January 2024 – lifetime emissions of the proposed development equate to almost 12% of the total baseline emissions across Wicklow County Council.
- Annual operational emissions are equivalent to an increase of 1.4% in transport emissions of GHG in Wicklow.
- GHG emissions, taken in the appropriate context, are quite significant and appear to be entirely incompatible with the objective of reducing GHG emissions

relative a comparable baseline consistent with the trajectory towards new zero by 2050.

*39. Carol Feely, Beechdale Close*

- Objects to the greenway proposal along Main Street, which will cause a risk of danger to pedestrians and cyclists.

*40. Catherine & Michael Kehoe, Burgage More*

- Concerned about increased traffic and traffic lights at the bridges; not enough parking to facilitate the extra visitors to the town; inadequate toilet facilities proposed; and lack of consultation.
- In favour of developing the Greenway as an asset to the area for locals and visitors alike.

*41. Catherine Miley, Baltyboys Lodge*

- Objects for reasons relating to the width of bridge footpaths and traffic lane, structural integrity of the bridges, traffic impact data, plastic separation bollards, construction phase concerns, lack of public transport, emergency services consultation, road safety audit, environmental impact (aquatic survey, white-clawed crayfish, displacement and other mammals), and felling of trees.

*42. Catherine O'Toole, Lacken*

- Greenway is for tourists and day trippers and does not take local needs into consideration.
- Additional public transport from Dublin is required, and there are concerns with parking removal in Blessington and impact on motorists.
- There is potential for pedestrian/ cyclist conflict in Blessington.
- Use of Waterford Greenway as a comparison model does not take account for day tripping from Dublin.
- Objects to traffic lights on bridges, tree removal, lack of aquatic survey, impact of asphalt run-off to lake, lack of toilet facilities, and impact on drinking water.

*43. Catherine Roche, Oldcourt, Manor Kilbride*

- Concerned with the type of vehicles using Blessington Bridge and the impact of the greenway on local communities.

*44. Catriona Byrne, Millbank*

- Needs assurances that parking spaces will remain free to clients and staff of solicitor's practice. Parking outside premises on Kilbride Road is being removed and objector questions if they will be reimbursed for financial contributions paid. Concerned about sightlines from access to premises.
- There will be undue conflicts between pedestrians and cyclists in Blessington.
- Placement of cycle lane will result in an increase of traffic at the Kilbride Road turning and specific lanes for cyclists and traffic lights will be necessary.

*45. Christine Kinsella, Valleymount*

- Objects to the proposed greenway for reasons relating to the likely effects on the environment (white clawed crayfish, greylag goose, lesser black-backed gull, other birds and wildlife), water pollution (runoff from asphalt), impact of tree destruction and construction of pathway, toilet facilities and lack of consultation, dog control, traffic lights on bridges, and car parking (existing, proposed and removal).

*46. Christopher Foster, Ballyknockan*

- Objects for reasons relating to traffic surveying, lack of toilets and bins, tree felling and impact on wildlife, fencing, car parking, traffic lights at bridges and emergency access, pedestrians and cyclists sharing space in Blessington, potential anti-social behaviour, and access to Tulfarris.

*47. Ciara Stewart, Baltyboys*

- Main objection is the proposed link to Tulfarris, which is considered to be entirely unsuitable and unsafe. The road is significantly steep and narrow, with several sharp and blind bends. Road is also used to move cattle and is used every 2 days by an articulated truck to collect milk.
- Objects to lack of consultation; boundary treatment; potential for increased crime; use of e-scooters; control of dogs; proposed use of bridges; felling of

trees; lack of toilets; litter; no visual impact assessment; impact on protected species in the lake including white clawed crayfish, otter, greylag goose and black-backed gull; lack of aquatic survey; impact on drinking water quality; and parking.

- FI request from Dublin City Council has not been adequately addressed, and there are no details relating to Irish Water's submission.

*48. Claire Carter, Ballyknockan*

- Objects for reasons relating to traffic surveying, lack of toilets and bins, tree felling and impact on wildlife, fencing, car parking, traffic lights at bridges and emergency access, pedestrians and cyclists sharing space in Blessington, potential anti-social behaviour, and access to Tulfarris.

*49. Cllr. Edward Timmins, Grangecon*

- Disagrees with proposal to install traffic lights at bridges.
- Full application was made without reference to local elected members.
- Disagrees with proposal to remove parking spaces outside businesses on Main Street and Kilbride Road.
- Questions the need for greenway to go along public roads (Tulfarris).
- Access points to the new greenway should not be situated adjacent to existing dwellings. Access should be related to new car parking.
- New toilet facilities should be established on the route.
- One off housing planning applications are severely limited in land located near the lakes, or streams feeding the lake.

*50. Cllr. Gerry O'Neill, Butterhill Lane*

- Does not support the plan in its current form because of parking reductions on Kilbride Road, lack of toilet proposals, the link to Tulfarris, traffic lights at bridges and lack of consultation.

*51. Dave Ryall, Baltyboys*

- Bridge footpaths are not wide enough at 1.52m and not compliant with WCC's own 1.8m recommendations.

- Bridge traffic lanes not wide enough for some agricultural and emergency vehicles. Emergency services not consulted.
- No consultation on boundaries and use of laneways.
- Concerns on monitoring of illegal parking.
- No toilet facilities when public houses are closed.

*52. David & Elizabeth O'Reilly, Red Lane*

- Objects for reasons relating to public consultation, traffic lights and width of bridges, removal of parking in Blessington, shared pedestrian cycle path, lack of aquatic survey, tree removal, asphalt runoff and impact on drinking water, lack of facilities, including toilets, security and vandalism, emergency access, and use of Waterford Greenway as a comparison model.

*53. David Gribben, Downshire Park*

- Opposes traffic lights on bridges, lack of additional sanitation infrastructure, management of route, litter and existing greenway using the hard shoulder of the N81.

*54. Deirdre Carroll, Carrig Glen*

- Objects to the proposed pathway and cycle track on Main Street as it does not take account of wheelchair access and local amenities.
- Proposed section at Rockypool will cause major obstruction to Carrig Glen.

*55. Development Applications Units*

- See section 9.2.

*56. Diana Gallagher, Lacken*

- Supports the Greenway for its potential to attract tourism, its positive impact on the local economy, and its ability to promote health and well-being.
- Specific areas of work needed on parking, toilet facilities and the traffic light plan at the bridges. Bridges around the lake were built in the 1930s and need to be upgraded.

*57. Dr. Niall Collins, Kilbride Road*

- Thought needs to be given to cycle path in front of dental surgery where access is needed for cars and even emergency vehicles.
- Plans do not show cycle path clearly.

*58. Dr. Andrina O'Brien, Lacken*

- Concerned about the section of the proposed greenway outside Blessington Family Practice and removal of ambulance space, disabled parking and car parking, as well as potential for pedestrian/ cyclist conflicts on shared space.
- There is a more suitable route for the greenway on the lake side of the town.
- Objects to proposed traffic lights at bridges.

*59. Dublin City Council Water Services*

- See section 9.3.

*60. Edel McKeon, Ballymore Eustace*

- Supports the greenway for reasons relating to its potential to attract tourism, the positive impact on the local economy, and the promotion of health and well-being.

*61. Edward Miley, Boystown*

- Objects to the Greenway in particular the Tulfarris link where objector farms 80 acres. Cows cross the road four times a day between February and November, and introduction of visitors to the area substantially increases the risk of injury to the public, their property or the livestock.
- Concerned about economic impact from increased insurance, damage of property and machinery, restricted access to land and loss of development rights.
- Concerned about lack of consultation and lack of infrastructure to prevent dogs from attacking livestock. At a minimum, a condition should be attached to any grant of permission requiring dog proof fencing along sections of the greenway which border active farmland.
- Proposal to convert a public roadway essential for local travel and economic activity into a greenway used for recreation is a point of huge concern to the locality.



*62. Eimear Behan, Valleymount*

- Objects to the greenway for reasons relating to lack of toilets, car parking and bins, no upgrade of bridges, impact on wildlife, and lack of consultation.

*63. Elizabeth Miley, Baltyboys Upper*

- Objects to the link to the hotel at Tulfarris, to the lack of consultation with local residents and the lack of toilets.

*64. Emma Keogh, Woodleigh Way*

- Objects to the cycle/ pedestrian path placed in the middle of the town, and associated parking removal.

*65. Eugene Headon, Naas*

- Agricultural contractor who envisages having an issue getting machinery across the proposed changed Blessington Bridge due to its width.

*66. Evelyn Pender, Valleymount*

- Highlights issues relating to the proposed use of the bridges, lack of consultation, car parking, impact on wildlife, tree removal and lack of toilets.

*67. Fiona Ryan, Downshire Park*

- Supports the greenway for reasons relating to its potential to attract tourism, the positive impact on the local economy, and the promotion of health and well-being.

*68. Garrett Headon, Naas*

- Restrictions such as the narrowing of bridges and traffic lights will increase pressure on farmers and agricultural contractors and will cause idling and/ or diversions, wasting time and fuel.

*69. Gary Stewart, Baltyboys Upper*

- Objects to the Greenway due to the Tulfararis link, and the installation of rock armour, which will be an eyesore.

*70. Glen Cullen, Valleymount*

- Object to the proposal for reasons relating to lack of toilets, in adequate traffic surveying and car parking proposals, one way arrangement on bridges, part pedestrianisation of Main Street to accommodate a cycle lane, anti-social behaviour, and the proposed link to Tulfarris.

*71. Glenn Queri, Ballymore Eustace*

- Supports the greenway for reasons relating to its potential to attract tourism, the positive impact on the local economy, and the promotion of health and well-being.

*72. Graham Coe, Threecastles*

- Supports the greenway for reasons relating to its potential to attract tourism, the positive impact on the local economy, and the promotion of health and well-being.

*73. Harry Farrington, Valleymount*

- Community has not been consulted on proposals for the bridges. People in Ballyknockan have to travel over two bridges to avail of essential services in Blessington.
- In favour of Greenway and opportunities that may bring to the area but feels there are outstanding issues in terms of public toilet facilities, car parking, tree removal and poor state of fencing.

*74. Helen Murphy & Seamus Walsh, Burgage More*

- Objects to the proposed traffic lights on bridges; the section of the greenway from the Avon to Knockieran Bridge; lack of proposals for the greenway hub; lack of parking at the Avon and in Blessington; and lack of toilet proposals.
- Greenways provide value to both users and locals but must be properly planned and must have broad community support.
- Requests oral hearing or refusal of permission.

*75. Helena Carstairs, Bannagroe*

- Lack of time given to the public to respond is unfair given the volume of information presented.
- No dedicated cycle paths on the route or through Blessington.
- No washroom facilities proposed and with projected figures of 300,000 this will not work.

*76. Hilary Sherlock, Knockieran*

- Objects to the entire scheme for reasons relating to the traffic lights at bridges the felling of over 7000 trees, the incongruous and unnecessary 4m wide ribbon of tarmacadam, considerable lengths of unsightly rock armour, inadequate car parking facilities, no toilet facilities, no adequate provision for litter collection, the shared space in Blessington, the narrowing of the Kilbride Road junction, pedestrian and cyclist conflicts, the unnecessary underpass at Knockieran, and the massive inconvenience to local residents.

*77. Irene Farrell, Beechdale Grove*

- The proposed shared path in Blessington is a safety concern. Parking removal would also make Blessington inaccessible for a considerable number of people.
- Plan should include serviced toilets and the whole Greenway route.

*78. Jacqueline Tyrrell, Rockypool Villas*

- Plan will impact on residents of Rockypool Villas in a negative way – traffic is already a huge problem given the proximity to St. Joseph's Hall.
- Propose removal of parking for the town will have a negative effect on the ability of people to do business.
- Increased volume of traffic that the Greenway will bring to the area has not been properly addressed. Proposed traffic lights on bridges will compound the issue.
- Current state of the road surface is not fit for purpose.
- Additional number of people accessing Rockypool Villas, a quiet, safe and community-based road, is of great concern.

*79. Jacqueline Tyrrell, Watergrass House, Lacken*

- Objects to the proposal for reasons relating to the proposed location of car parks, the proposed bridge layout, structural capacity at these bridges, traffic congestion, management and proposed installation of traffic lights, and the disappointing lack of consultation with stakeholders.
- WCC should look at the feasibility of a central car park on the N81 and the implementation of suitable shuttle transport.

*80. James McDonnell, Valkeymount*

- Objects for reasons relating to the closure of one lane and all bridges, lack of consultation with emergency services, removal of parking on Main Street, cutting down of 7000 trees, and risk of impact on drinking water quality.

*81. James Mooney, Ballymore Eustace*

- Supports the greenway for reasons relating to its potential to attract tourism, the positive impact on the local economy, and the promotion of health and well-being.

*82. Jane & John Stanley, Valkeymount*

- Hoped to work with the County Council and develop their land into a publicly accessible not for profit nature reserve with the focus on educating visitors.
- If tarmac surfaces were dropped it would be possible to construct the Greenway by removing fewer trees and minimise the environmental effect.
- Badger sett is on a very narrow strip between the boundary fence and the shoreline, and it will be completely destroyed by removing the trees. Observer offers their land as a diversion to the greenway to avoid the sett. Observer found snares at the badger sett.
- There are at least four points where water crosses the Greenway from observer's land and plan shows no water crossing structures.
- Greenway plans show no gate in the fence and the rock armour blocks observer's slipway.
- If observer's land is to be used as construction compound and they have not given permission for its use to a 3<sup>rd</sup> party.

- Shelter from wind provided by trees on the shoreline will be affected if the trees are removed and this may affect the suitability of the land for Marsh Fritillary.
- Removal of trees would make a large number of properties visible from all around the lake.
- Should be a condition of planning that only granite sourced within the local area is used for rock armour. Rock armour is not natural in appearance and is unsightly over a long distance.
- Developer does not understand the importance of trees around the lake shoreline. The whole nature and stability of the lake shore will be affected if large numbers of trees are removed when wind speeds appear to be increasing, and it is not a good time to remove these trees.
- Concerned about the lack of toilets and the tarmac surfacing to be used on the greenway.
- Tree removal may affect peregrine Falcons, Woodpecker and Osprey. Grey wagtail have been seen on the lake shore and the sandy shore attracts a large number of fish fry. Lakeshore trees also out as a wildlife corridor.
- Concerned about possible pollution and disrupting affecting habitat of crayfish and freshwater mussels in the lake.

*83. Jane Nolan, Ballymore Eustace*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

*84. Jenise O'Brien, Baltyboys Lower*

- Objects due to traffic and parking concerns, lack of toilets and bins, tree removal.
- Money should be spent on alternative proposals or making the current greenway more accessible and environmentally sustainable.

*85. Jennifer Dunne, Ballyknockan*

- Asks that greenway is rejected for reasons relating to the proposed traffic lights on the 3 bridges; insufficient parking; tree felling; walking on the Tulfarris

section; tarmacadam surfacing; pollution of the lake; and parking restrictions in Blessington.

*86. Jenny Cullen, Ballyknockan*

- Objects for reasons relating to traffic surveying, impact of traffic at bridges, lack of toilets and bins, impact on Dublin drinking water supply, trespassing, tree felling, fencing, car parking, impact on Main Street including disabled parking removal, and the proposed link to Tulfarris.
- Blessington to Poulaphouca to Tulfarris and back would be a better plan – would take 8 hours to walk the proposed greenway.

*87. Jim Haide, Blessington Orchard*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.
- Current greenway offers a great amenity for walking, running and safe cycling.

*88. Joanna Barry, Russborough*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

*89. Joanne Butler, Valleymount*

- Objects to the greenway in its current form for reasons relating to the proposed traffic lights on bridges; unrealistic sustainable transport access; parking around the lake; traffic surveying; impact on environment and wildlife; runoff from tarmac; impact on Blessington Main Street; lack of community consultation; no toilet facilities along the route; insufficient consideration for disability access; and insufficient plans for the management of the greenway.
- Petition of 1,500 signatures opposing traffic lights on bridges was ignored.
- A lot of people were originally in favour of the greenway and flaws have turned them away from it.

*90. Joe Morrissey, Manor Kilbride*

- Concerned about the potential impacts on drinking water from run-off from tarmac and increased effluent from public houses.

- No aquatic studies have been carried out – White Clawed Crayfish reside in the lakes.
- Greylag goose and Lesser Black-backed gull reside on the lakes and nesting has been recorded at Valkeymount and Threecastles.
- Concerned about dog control, one-way bridges with traffic lights, health & safety of walkers where dairy cows are crossing, animal health and lack of consultation.

*91. Johanna Kelly & Kevin Osborne, Valkeymount*

- Objects for reasons relating to a lack of toilet facilities, no additional car parking, no additional waste disposable facilities, no upgrade to the bridge crossing the lake, removal of car parking in Blessington, and removal of large number of trees.
- Greenway will be a fantastic asset to the area but only when planned and executed correctly - original plan should be implemented.

*92. John Crimin, Main Street*

- Objects to the proposed cycle lane from Kilbride Road onto Main Street at an extremely busy traffic junction, and the impact on the disability space, as well as impact of access for customers to any of the businesses in this side of the street. Objects to removal of on-street parking.

*93. John Fitzsimons, Manor Kilbride*

- Objects to traffic lights on bridges and how it will affect his farming business and agricultural contractors using large machinery. Also has concerns about car parking and congestion.

*94. John McEvoy, Ballyknockan*

- Concerned about lack of toilets, litter, use of bridges, anti-social behaviour and disregard for the ecosystem around the proposed development.

*95. John O'Dwyer, Liffey Farm*

- Supports the observations of Dr. Andrina O'Brien of Blessington Family Practice.

- Greenway is a positive and welcome development for Blessington, and it should not be implemented in a manner that will result in negative impacts on businesses, property owners, members of the local community, and essential services.
- Dedicated boardwalks should be erected on bridges to avoid any disruption or delay to traffic.

*96. John Price, Woodend*

- Measurements for Knockieran Bridge are incorrect. Objects to traffic lights and health and safety concerns with single lane vehicle traffic, in particular, for agricultural and transport vehicles.
- Concerned about data provided for Traffic & Transport Assessment Report and no public transport capacity surveys carried out on bus services.
- No consultation with emergency services.
- Road Safety Audit concerns for bridges, pavement and shared access roads.
- No aquatic surveys carried out on lakes and watercourses.
- Concerns regarding incorrect information in WCC's application of effects on Greylag goose and Lesser Black-backed Gull and absence of site-specific conservation objectives.
- Incorrect mapping information contained in response to ABP submissions regarding tree planting at Knockieran.
- No visual impact assessment and effects of rock armour and laying of 33km of asphalt on Area of Outstanding Natural Beauty.
- Safety concerns regarding the Tulfarris Hotel/ Golf Resort section of the greenway.
- Concerns regarding lack of design and fencing details.
- No detail on Irish Water and Dublin City Council observations – both raised serious concern on the impact on draining water.
- Concerns regarding rock armouring and effects on lakes and wildlife.



- Concerns regarding management, safety and operation of the greenway and the lack of policy for e-scooters.
- Insufficient bat reports and breaches of EU Habitats Directive.
- Board should refuse permission given the flaws in the design; environmental impacts; safety concerns; traffic light and single lane bridge concerns; lack of public consultation; absence of toilet facilities; lack of aquatic, environmental and visual impact reports; and effect of climate policy and emissions.
- Petition from February 2022 objecting to traffic lights and single lane on the three main bridges spanning Blessington Lakes appended.

*97. John Stones, Valleymount*

- Objects for reasons relating to traffic lights on bridges, boundary fencing, lack of consultation, lack of toilets, anti-social behaviour, loss of trees and pollution of the lake, and the link to Tulffaris.

*98. Jonathan Riche, Humphreystown House*

- Objects to the proposed traffic lights on bridges, the routing of the greenway through Blessington town, and the lack of dedicated toilets.

*99. Karen Price, Wood End*

- Objects to the Greenway for reasons relating to its effect on the lakeside environment; the lack of consultation with community, stakeholders, residents and business; the traffic lights and single lane system on bridges; the absence of toilets on the lake side of the greenway; and the proposed Main Street and Kilbride Road shared cycle pedestrian path.

*100. Kathleen Clarke, Humphreystown*

- Objects to propose traffic lights on bridges and lack of bins or toilets.

*101. Kathleen Halligan, Valleymount*

- Concerned with the mixing of leisurely greenway visitors and everyday vehicular traffic of the area.
- No structured consultation with the many and varied stakeholder groups who will be impacted by the greenway plans.

- Objects to proposed traffic lights on bridges.
- Concerned that two protected species are in danger of being driven from the area.
- 4 metre wide tarmac road is planned instead of a crushed stone pathway.
- No provision for public toilets and litter management, and 7000 trees will be removed, which currently provide windbreaks to nearby homes.

102. *Kathleen Leonard, Valleymount*

- Objects to traffic lights on bridges; lack of toilet facilities; lack of proper parking areas; the volume of visitors to the area; felling of 7000 trees and disruption to wildlife; and shared pathway in Blessington.
- If designed correctly, greenway could be a wonderful amenity.

103. *Kathleen Whyte, Lacken*

- Supports greenway but has concerns about bridges becoming single lane; parking; lack of toilet facilities; and potential impact on water quality and the environment.
- Greenway route should be shortened, and bridges should be upgraded.

104. *Keira Eva Mooney, Ballymore Eustace*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

105. *Kevin Crowe, Hollywood*

- Concerned at plans for the greenway. Since lake was flooded, wooded area around it has been a defector nature reserve.

106. *Kevin Foster, Valleymount*

- Objects for reasons relating to traffic surveying; lack of toilets and bins; impact on Dublin drinking water supply; felling of trees; fencing arrangements; inadequate car parking; traffic lights on bridges; proposals for Blessington Main Street; potential for anti-social behaviour; and the proposed link to Tulfarris.

107. *Kildare West Wicklow Irish Farmers Association*

- Issues and concerns raised by farmers and landowners with regards to consultation, traffic, proposed bridge arrangements, car parking, environmental impact, fencing, health and safety, insurance, privacy, access, anti-social behaviour, toilet facilities, the link to Tulfarris, necessity to access private lands, animal disease, and dogs and dog control.

*108. Lacken National School*

- School has 100 pupils and is open 182 days a year. Five buses serve the school.
- Traffic surveys do not reflect a typical school week.
- Allocation of 20 spaces at Lacken does not take into account that the car park is already beyond full capacity.
- Lacken National School needs to have its own dedicated car park.
- Serious safety issues on the laneway and existing car park leading to the national school have not been identified or reported on. Road Safety Audit is incomplete.
- Lacken car park should be delisted as a designated parking place for the greenway.

*109. Larry Cullen, Valleymount*

- Objects to Greenway for reasons relating to access to land for passways; traffic lights on bridges; loss of disability parking at shops on Main Street; felling of trees and damaging of ecosystems; proposed detours off the greenway; no increase in bus turning points or car parking; no toilet facilities or discussions with local businesses to use toilets; anti-social behaviour and littering; dangerous road conditions; and risk of damage to water supply and ecosystems.

*110. Laura Cullen, Valleymount*

- Concerned about traffic, use of bridges, lack of toilets, intrusion of wildlife, impact of farmland and animals, and noise pollution.

*111. Laura Kavanagh, Rockypool Villas*

- Concerned about proposed cycle and walk path passing the gate of their house. Road at this location is susceptible to flooding.
- Objects to Blessington Main Street being used as a cycle/ walking track for the proposed greenway.
- Adding to traffic in Blessington is unacceptable without completing the ring road.

112. *Laura McGillicuddy, Manor Kilbride*

- Objects to proposed new greenway route.

113. *Laura Power, Carrig Glen*

- In favour of greenway but believes that the proposal is not fit for purpose, and the negative impacts would far outweigh any positives. Greater public consultation should take place in a bid to achieve a less invasive proposal.

114. *Laura Querl, Ballymore Eustace*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

115. *Leo O'Connor, The Star, Valkeymount*

- Pub is not connected to mains sewage and toilets are not for public use.
- Traffic lights will cause congestion during busy periods at Valkeymount where there is access to other facilities.
- Road to Tulfarris is not suitable.

116. *Liam Mooney, Hollywood*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

117. *Liam O'Brien, Baltyboys*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

118. *Linda Cullen, Vallymount*

- Objects for reasons relating to lack of consultation, the proposed one-way traffic system on bridges, no increase in car parks, lack of bus turning points, the link to Tulfarris, lack of toilet facilities, use of local roads by cyclists, use of farmer's land, upkeep of greenway, habitats – SPA, tree falling, and impacts on Blessington Main Street.

119. *Linda Duncan, Newtown Square*

- Objects to certain elements of the greenway including the extra parking at Russeltown and the use of asphalt in proximity to the lake; impact of traffic lights on the bridges, tree removal, lack of consultation, lack of public toilets, access for the disabled, impacts on Blessington village, monitoring and evaluation, and road safety.

120. *Lisa Donovan, Sroughan*

- Objects to the proposed greenway, in particular, the traffic lights on bridges, the cutting down of trees, and turning footpaths into pedestrian and cycle lanes.

121. *Louise Hanbidge, Stratford on Slaney*

- Agrees in principle with the idea of the greenway but does not think it is appropriate to make so many changes to an already extremely busy town. Concerned that the cycle lane will pass through Blessington in the manner suggested.
- Opposes, the erection of traffic lights on the route and the lack of toilet and changing facilities.

122. *Luke Timmins, Burgage Manor*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

123. *Malwina Hanlon, Knockieran Lower*

- Objects to traffic lights on bridges, lack of consultation, road safety auditing, tree removal, lack of public toilets, disability access, impacts on Blessington village, drainage and pollution, and no noise survey conducted on the proposed route.

124. *Margaret Miley Gallagher, Lacken*

- Objects to traffic lights on bridges, the proposed bike lane in Blessington, lack of toilets and adequate fencing for farmland, and the lack of accommodation for tourists.

125. *Margaret Schofield, Lacken*

- Objects to the proposed greenway due to inadequate planning and community consultation, environmental concerns, water quality and pollution risks, traffic and safety issues, and lack of infrastructure and management plans.

126. *Margaret & Desmond Tyrrell, Rockypool Villas*

- Objects to the proposal due to lack of consultation, traffic safety on Rockypool Villas, parking in Blessington, traffic volumes, road surface, and invasion of privacy.

127. *Margaret Whelan, Dunlavin*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

128. *Maria O'Hara, Tinode*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

129. *Maria Walsh, Baltyboys*

- Objects to the proposed link to Tulfarris Hotel, to the lack of consultation with local residents, and to the lack of toilets.

130. *Mark Wright, Valleymount*

- Roads around lakeside are not suitable for large volumes of traffic.
- Objects to traffic lights, lack of toilets, lack of consultation, lack of project management, tarmacking, risk of pollution of drinking water, anti-social behaviour, threat to protected species, inconvenience to main street users, Tulfarris section, tree felling, invasive species, impact of construction vehicles on Valleymount village, and boundary fencing.
- Highlights issues of concern raised by farmers and landowners from Kildare/ West Wicklow IFA including those relating to consultation, traffic, bridges (poor state of repair), car parking, environmental impact, fencing, health & safety,

insurance, privacy, access, anti-social behaviour, toilet facilities, the L8360 to Tulfarris, private lands, animal disease, and dogs and dog control.

131. *Martha Brennan, Lacken*

- Has concerns regarding the traffic light system on bridges, inadequate public toilet facilities, car parking capacity, the use of asphalt with its toxic runoff into the reservoir, and the extensive use of rock armour.
- Welcomes the boost the greenway may bring to the town, but current proposal will result in the deterioration of this Area of Outstanding Beauty.

132. *Martin Hennessy, Main Street*

- Concerned about lack of consultation with business owners, car parking removal on Main Street, traffic lights on bridges, and lack of toilet facilities.

133. *Martina Sammon, Park View*

- Looks forward to future greenway development but has concerns regarding the traffic lights on bridges, parking removal in Blessington, no toilet facilities, tree removal, little to no new car parking, and the proposed shared footpath and cycle paths in the village.

134. *Mary Ball, Rockypool Villas*

- Concerned about lack of consultation, traffic safety on Rockypool Villas, parking removal on Main Street, increased traffic volumes and traffic lights on bridges, road surfacing, and invasion of privacy.

135. *Mary Cullen, Ballyknockan*

- Objects to traffic lights on bridges, removal of parking on Main Street, and potential litter problems. Completely rejects whole plan for Blessington Greenway.

136. *Mary Steeds, Baltyboys*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

137. *Maura Byrne, Valleymount*

- Objects for reasons relating to impact on wildlife, traffic lights, tree felling, tarmacking, lack of toilet facilities, and potential for pollution.

138. *Maura Fitzpatrick, Rockypool Villas*

- Concerned about lack of consultation, traffic safety on Rockypool Villas, parking removal on Main Street, increased traffic volumes and traffic lights on bridges, road surfacing, and invasion of privacy.

139. *Maura Hughes, Baltyboys*

- In favour of the greenway, but objects to traffic lights on bridges, the link to Tulfarris, and the lack of toilet facilities.

140. *Michael Bailey, near Valleymount*

- Objects to traffic lights on bridges – current arrangement is adequate with inclusion of suitable signage and should at least be trialled.

141. *Michael Scholfield, Lacken*

- Objects for reasons relating to inadequate planning and community consultation, absence of EIAR, traffic lights on bridges, environmental concerns, water quality and pollution risks, traffic and safety issues, and lack of infrastructure and management plans.

142. *Michelle Mooney, Ballymore Eustace*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

143. *Mick & Sinead Phibbs, Blackrock*

- Concerned about installation of traffic lights on the Blessington to Lacken bridge.

144. *Molly & Kevin Byrne, Valleymount*

- Objects for reasons relating to traffic lights at bridges, lack of consultation with emergency services, impact of white clawed crayfish and wildlife, removal of trees, lack of toilets, leakage from asphalt to reservoir, car parking, consultation and privacy concerns.



145. *Niall Geoghegan, Valleymount*

- Objects to traffic lights on bridges and is concerned with the increased footfall of people to the area with no services such as toilets, bins and car parks.

146. *Niamh Ryan, Baltyboys*

- Welcomes the Greenway and positives that it will bring, but objects to the limited parking, no toilets, and traffic lights on bridges.

147. *Nicola Farrington, Valleymount*

- Objects for reasons relating to the proposed traffic lights on bridges, parking removal on Main Street, removal of over 7,000 trees, lack of toilet facilities, and lack of consultation.

148. *Noel Kennedy, Carrig*

- Objects for reasons relating to traffic lights on bridges, cycle lanes in Blessington, lack of toilets, removal of trees, tarring of pathways and pollution of reservoir, anti-social behaviour, and the proposed link to Tulfarris.

149. *Noelle Kavanagh, Baltyboys*

- Objects for reasons relating to lack of consultation with local people, traffic lights on bridges, increase in litter and rubbish, no toilets planned, impact on local farmers, anti-social behaviour, removal of parking on Main Street and impact on local shops.

150. *Oliver Stones, Valleymount*

- Objects for reasons relating to lack of consultation, boundary fencing around observer's land, no toilets in the area, crime in the area, loss of trees and pollution of the lake, and the proposed link to Tulfarris.

151. *Olivia Ryall, Manor Kilbride*

- Objects to proposed shared cycle/ pedestrian path on Main Street. Observer has an assistance dog and regularly uses this footpath and the parking spaces.

152. *Olwyn Sheehan, Ballymore Eustace*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

153. *Pamela & Cormac Chambers, Baltyboys*

- Objects for reasons relating to traffic lights on bridges; road signage for traffic speeding; pest control; excavation and impact on lake and water system, drainage and ground stability; lack of toilet facilities; Tulfarris section; parking; and construction traffic.
- Plan and profile 143.9 not available online to see what is proposed for Tulfarris section. Planned route appears to cross a T junction on a long straight road where speeding occurs.

154. *Pat Quinn, Knockieran Lower*

- Concerns about future maintenance of the greenway; past maintenance of Blessington Bridge; and potential for overtourism. Would support a walking trail as a suitable and sustainable economic alternative (examples included).

155. *Patrick & Orla Nolan, Lacken*

- Concerned about camping, noise and litter and what the plans will be for the village of Lacken in terms of parking and amenities.

156. *Cllr. Patsy Glennon, Hollywood*

- Concerned with the lack of proposed parking, loss of parking on Main Street, and lack of publicly maintained toilets. Suggests cantilever bridges or boardwalks on the side of the existing bridges.

157. *Paul Miley, Baltyboys*

- Objects to the proposed development, and in particular the Tulfarris link, due to impact on observer's livelihood and that of his family, of consultation with local residents, health and safety risks, and lack of infrastructure to support the project.

158. *Peter & Brid O'Sullivan, Baltyboys Lower*

- Raises concerns about traffic lights on bridges, parking and toilets.

159. *Rachel Murphy, Deerpark Close*

- Objects to traffic lights on bridges, lack of toilets, cycle lanes in Blessington village, the condition of the existing N81 road, and the narrowing of the road at the junction at the AIB back in Blessington.

160. *Raymond O'Sullivan, Woodend, Naas*

- Traffic lights and traffic management systems at bridges are totally unacceptable to the majority of residents in the area.
- EIAR is required for the proposed development -Significant medium and long term negative impacts on the environment are likely due to the amount of tree felling and other works adjacent to a highly sensitive receiving environment.
- Encroachment into SPA will have significant negative impacts on designated species and other wildlife and wild fowl frequenting the reservoir. Proposed development fails to meet the conservation objectives of the SCI species.
- Primary reason for decline of Greylag geese is disturbance and adverse impacts. Potential disturbance was accepted as a significant contributing factor for their decline by Ms Justice Miriam O'Regan in the recent High Court case brought by Raymond O'Sullivan.
- Application documentation does not address the reasons for the declining numbers of Greylag geese or potential long-term impact of additional disturbance of the roosting areas.
- Appropriate assessment should assume as a minimum, that an objective is to ensure that species are not significantly disturbed - applicant outlines a range of activities that can impact negatively on bird species, including human disturbance, dog disturbance, motorised vehicle disturbance, light infringement, etc. Designated species could change their foraging locations, reduce roosting times and change migration behaviour. Not one resting or foraging location was identified or located in the applicant's survey submission.
- Any encroachment or disturbance of this SPA as a consequence of the proposed development is unacceptable and should constitute appropriate

grounds for refusing permission - erosion protection is the responsibility of ESB, not WCC.

- Applicant's statement that Greylag geese do not utilise the portion of the reservoir to the south of Blessington bridge is incorrect – geese have been sighted at Baltyboys in the past.
- Independent ornithological assessment concludes that most recently available survey information has not been included - what is included is an out-of-date snapshot of the situation as it was 10 or more years ago and should not be relied upon.
- Recreational disturbance impacts have not been adequately assessed – in particular, dogs off lead are a significant cause of disturbance. No appropriate recommendations are put forward to mitigate disturbance to wildlife and habitat for any species of bird or mammal.
- No provision of toilet facilities is contrary to the Guidelines for Greenways and Cycle Routes Ancillary Infrastructure (Department of Transport, Tourism and Sport).
- Proposal requires the removal of over 7000 trees, some of which are likely to harbour bat species. No map has been prepared to identify trees with individual roost features. Proposed mitigation as ineffective in light of the strict protection afforded to bats species under the EU Habitats Directive.
- Bat survey undertaken was primarily a desk study but this alone does not constitute a comprehensive bat survey. No evidence in the survey material to identify where or how many trees were surveyed or inspected, and not one bat roost location was identified.
- No aquatic survey of the reservoir was carried out.
- Concerns relating to the toxicity of runoff water from newly laid tarmac.
- Scale of upgrade to the proposed new bridge over Annacarney Stream is a significant escalation of development.
- Results received by WCC in favour of the Part VIII application made in 2017 should not be taken as a measure of support for the current application.

- Proposal contradicts Development Plan objective which states that “*Tourism assets will be managed in a sustainable manner to protect against any detrimental impacts on the environment and local communities.*”
- Suggested sustainable transport access to the proposed greenway is unimplementable. Proposed development will contribute nothing to the proper planning and sustainable development of the area.
- It is the policy of Irish Water that any development that will contaminate Irish Water's drinking water supply at Blessington should be refused permission. There are concerns about the increased septic tank load on premises not connected to mains wastewater treatment.
- While the proposed development may have positive health, well-being and economic benefits, there is also the potential for habitat loss, significant disturbance and negative impacts on biodiversity on protected species.

161. *Richard & Lorraine Willoughby*

- Concerned about proposals for bridges, health and safety of all road users, wellbeing of locals, lack of car parking, the link to Tulfarris, lack of toilet facilities, use of farmers' land, upkeep of greenway, and proposals for Blessington Main Street.
- Willing to support the correct planning and infrastructure for the greenway project.

162. *Roisin Ellis, Carrig Glen*

- Objects to shared pathway in Blessington.

163. *Ronan O'Dwyer, Lacken*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

164. *Rose Kennedy, Carrig*

- Objects mainly for reasons relating to traffic lights on bridges and the proposed cycle lanes in Blessington, and also has concerns regarding lack of toilets, tree removal, tarring pathway, anti-social behaviour, and the link to Tulfarris.

165. *Ross Butler, Valleymount*

- Mainly concerned about traffic and parking, proposals for the bridges, and impact on Blessington Main Street.
- Most of the lakeside community was in favour of the greenway at some point but flaws in plans have turned people against it.

166. *Roy Sherlock, Knockieran*

- Objects to the entire scheme as an unnecessary 4m wide ribbon of tarmac, the felling of over 7,000 trees, the deposition of considerable lengths of rock armour and fencing, inadequate car parking, no toilets, inadequate provision for litter collection, and the massive inconvenience to local residents.
- Also objects to traffic lights on bridges, routing of the greenway through Blessington town centre, conflicts between speeding cyclists and walkers, the link to Tulfarris, and the proposed underpass and Knockieran.

167. *Sally Ann & Willie Ryall, Knockieran*

- Objects to proposed use and condition of bridges, width of footpaths and traffic lanes and use of separation bollards; traffic assumptions based on Waterford Greenway; disruption to wildlife and pollution of lake; absence of public transport around lakes; emergency services consultation; non-specific nature of Road Safety Audit; absence of aquatic survey and presence of white-clawed crayfish in the lake; recently recorded nesting at Vallymount and Threecastles; impact on mammals; removal of trees; lack of consultation with businesses and land owners including public houses about use of toilets; boundary and fencing; monitoring and evaluation; impacts on Blessington Village; dog control; noise surveying; access to Russborough House; lack of policy for scooters; and lack of time given to public to respond to further information submission.

168. *Sam Wynn, Valleymount*

- Objects to tarmacadam surface, tree removal (habitat, wind break, amenity and erosion), wet surface conditions, lack of toilets and parking, and destruction of habitat for protected and other species.
- No against the greenway in principle but there is nothing in the proposed development that is “green” in any way.

169. *Seamus Doyle, Valleymount*

- Objects to wildlife reporting; traffic lights on bridges; car parking; tree felling; walking on the Tulfarris section; tarmacking; and potential pollution of the lake.

170. *Seamus Kelly, Crosscoolharbour*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

171. *Seamus McDonnell, Lacken*

- Objects to traffic lights and shared footpath in Blessington.

172. *Sean Ascough, Lacken*

- Objects for reasons relating to absence of consultation with local residents and landowners, single lane traffic and traffic lights on bridges, narrow cycle lane proposed at bridges, traffic management, interfacing between landowners and lake users, land drainage, excessive rock armouring, lack of toilets, effect on environment, no fencing upgrade, greenway safety/ security/ management, loss of parking in Blessington, and parking and road safety in Lacken.

173. *Sean Farrington, Tulfarris Road*

- Objects to Tulfarris link, traffic lights on bridges, impact on Blessington Main Street, tree removal, lack of car parking, and lack of toilets.
- In favour of greenway but disappointed that alternatives to keep roads unchoked and to blend the greenway with the countryside were ignored.

174. *Sean Twomey, Phibsborough*

- Supports the proposed development and believes that other greenways throughout the country are a benefit to the locality.

175. *Sharon Geoghegan, Valleymount*

- Objects to traffic lights on bridges, lack of toilets and lack of parking.
- Plan needs to be reviewed.

176. *Sheila Kinane, Valleymount*

- Objects to traffic lights on bridges, lack of parking and lack of toilets.

177. *Sinead Carroll, Carrig Lane*

- Objects to route through Blessington – this part of the proposal needs to be redrawn.

178. *Sinead McDonald, Monasterevin*

- Objects for reasons relating to biodiversity (tree felling, red squirrel, protected birds, bats and white clawed crayfish). There are already huge problems with algae in the reservoir.
- Potential problems with the number of tourists and those swimming in the lake.
- Potential traffic related problems from bridge proposals, car parking, and Blessington Main Street proposals.
- Potential problems with littering and lack of toilets. Eco toilets should be considered.

179. *Stephen Donnelly TD, Greystones*

- Constituents have spoken out regarding the proposal to control traffic on bridges.
- Appears to be inadequate provision for increased parking. Alternative additional parking within proximity to affected businesses should be incorporated.
- Toilet facilities need to be provided and maintained by the local authority.

180. *Steve Doran, Blessington Manor*

- Fully supports the greenway proposal. As a consequence of the existing section of greenway, both young and old are more active, more connected with nature, and have improved wellbeing. Proposal will breathe life back into lakeside communities.

181. *Steven Pettigrew, Westpark*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.

182. *Susan Rossiter, Burgage Manor*

- Has concerns regarding traffic lights on bridges, parking, limited public transport, toilets, environmental impacts, waste management and lack of consultation.



- In favour of greenway that is designed and constructed to the higher standards, taking into consideration its impact on both the environment and local community.

183. *Tara Kelly, Hollywood*

- Objects to proposed tarmac surface, impact on drinking water, disturbance of birds, impact on livestock, litter, lack of parking, traffic lights on bridges, and traffic impact.

184. *The Valkeymount Peninsula Wildlife Project*

- Objects for reasons relating to the misleading nature of the public notice (roadway); vague detail in terms of design at Annacorney Bridge; impact on the SPA and potential for water pollution; the standard design and number of culverts; and proposals for rock armour and the actual quantity. There is no reference to a bridge in the notice, which is a fatal error.
- There are no recommendations as to what remedial action should be taken if a negative impact on SCI species occurred. There is no consideration for potential impact of SCI species, no consideration given to the disturbance they will endure during construction and operation, and little consideration for their habitat destruction.
- Greylag goose numbers have declined significantly over the past 20 years with the primary reason for this decline being disturbance and adverse impacts - any further disturbance will contribute to further decline in numbers.
- WCC appears not to have considered Schedule 5 Part 2 Paragraph 10(dd) of the Regulations relating to the provision of roads, which is defined as any street, lane footpath or passage and includes any bridge, viaduct, underpass or overbridge and includes, with regard to Section 68 of the Roads Act, 1993, a cycleway.
- Way in which subthreshold development is assessed relative to significant effects on the environment is not being carried out in a manner consistent with the EIA Directive. Failure to engage with the issues required to be addressed in the Habitats Directive fails to address in a practical and appropriate manner the obligations under the EIA Directive.

- No aquatic survey has been carried out on the SPA the overall Fauna Report needs considerable work. Bat report is also inadequate.
- SPA is not clearly defined on any drawings, particularly at the proposed new Annacorney Bridge. Conversion of current pathway to tarmac roadway can only result in pollution on the existing greenway section through the SPA.
- Boundaries on maps are not clearly delineated - proper demarcation of landowner details are crucial for transparency, accurate assessment, and effective communication among stakeholders.
- Proposed development is not universally accessible due to excessive gradients.
- Population of Dublin is nearly 10 times that of Waterford - lack of proper forecasting undermines the traffic potential to the area.
- Public consultation process was not as truthful or friendly as WCC would like to convey.
- There is a lack of proposed toilets.

*185. Thomas Butler, Valleymount*

- Main concern is the proposed traffic lights on all the bridges – vast majority of visitors will travel to Blessington by car.
- Concerned about the lack of parking around the lake, particularly at weekends.
- Traffic assessments were carried out during the week between 9 & 10am, which is hardly peak traffic flow time.
- Concerned about the impact on the environment and wildlife - no aquatic survey carried out, and water quality will be impacted by runoff from tarmac.
- Unsafe that the Greenway is part of Main Street.
- Also has concerns about lack of community consultation, traffic, lack of toilet facilities, litter, disability access, the potential for accidents involving shared pathways with cyclists, and sufficient plans for management of greenway.

*186. Thomas Kelly Hollywood*

- Objects for reasons relating to lack of consultation, proposals for the bridges, impact on drinking water due to lack of toilets, dogs and tarmac, removal of

parking in Blessington, impact on wildlife, removal of trees, and the proposed link to Tulfarris.

- Concerns about impact on farming from dogs, fencing, parking, and anti-social behaviour.

187. *Tom Ascough, Loughlinstown*

- Endorses all the points in the submission made on behalf of Carmel Ascough.
- Requests oral hearing given the extensive nature of observations to date.
- Requests the Board to reject the proposal in light of the major deficiencies in the information provided by WCC and the failure to rectify these deficiencies.

188. *Tom Mooney, Valleymount*

- Objects for reasons relating to likely effects on the environment of Blessington Lakes (White Clawed Crayfish, Greylag Goose, Lesser Black-backed Gull, other birds and wildlife, water pollution, impact of tree removal and construction of pathway, lack of toilet facilities).
- Implications for the proper planning and sustainable development of the area (traffic lights on bridges and lack of parking spaces).
- There should be more input from the local community and a more suitable application should be submitted that does not impact on daily lives and the surrounding community.

189. *Tony Crowe*

- Opposes greenway as it will destroy habitat and areas of semi wild land.

190. *Tony & Annette Kavanagh, Baltyboys*

- Objects to the lack of consultation, the link road to Tulfarris, traffic lights on bridges, felling of trees, no toilet facilities planned, potential increase in crime in the area, increased rubbish in the area, no visual impact statement, and impact on protected species in the lake.

191. *Turlough Kinane, Westpark*

- Looks forward to hearing of a positive outcome for the greenway development which will bring good benefits to the area subject to satisfactory resolution of issues relating to bridges / traffic / roads, wildlife and fauna, toilet facilities, impact on Blessington, stakeholder consultation and other items such as drainage, pollution and noise.

192. *Uisce Éireann*

- See Section 9.4.

193. *Valerie Hanlon, Knockieran Lower*

- Objects for reasons relating to lack of consultation, traffic lights and use of bridges, traffic trip impact, lack of public transport, aquatic surveying, impact on SPA, impact on other animals, tree removal, lack of public toilets, disability access, monitoring and evaluation, impacts on Blessington village, dog control, fencing solutions, drainage and pollution, noise surveying, and lack of policy for e-scooters.

194. *Valleymount and Ballyknockan Forum*

- Proposal is an unrealistic plan with no real consideration for local residents around the lake environment, the SPA or wildlife.
- No aquatic survey has been carried out on the SPA.
- Protection of otter, the qualifying interest of the SAC, is vaguely considered - their primary food source also needs to be protected, (crayfish can be a dominant prey species).
- Overall fauna report needs considerable work - No camera traps used to confirm whether holts/ dens/ setts are currently being used.
- Bat report is inadequate - only four survey locations and no evidence of bat survey looking at over 7000 trees earmarked for felling to see if any of those are bat roosting sites. Desk survey results are outdated ranging from 2000 to 2013 and no night visual aids were used.
- Lesser black backed gull have been sighted at Valleymount Bridge and Ballyknockan shoreline. Real impact of pollution and disturbance on these

species is not considered as they are deemed to roost well away from the proposed development and feed only on agricultural fields. Lesser black backed gulls feed on a variety of foodstuffs including fish.

- Sets out plan to monitor both species post operational phase but not during construction phase and there is no mitigation precautions proposed pre-construction.
- Proposed development is an actual road and comes well within the threshold of 2km for acquiring EIA and construction of bridge at Annacarney requires EIA. There is no landscape plan showing reinstatement of habitat and connection to mammal ledges during construction and operation phases at Annacarney Bridge. This bridge comes within 25m of the SPA and stockpiling of excavation material cannot take place within 50m of the SPA. Bridge construction also requires in situ concrete pouring.
- Unclear what dynamic modelling has been used to ascertain the hydraulic impact of constructing a new bridge beside an existing bridge. In general, the proposed development encroaches on the SPA most especially around the mouths of watercourses/ streams flowing into the lake - this can only result in pollution.
- WCC have fallen short in responding to the Board's request relating to land ownership and its identification on maps.
- There are inconsistencies in documentation relating to the amount of rock armour to be used - Only 0.6km of rock armour is accounted for in the NIS and drawings appear to show an excess of 5km.
- Designers referred to coastal erosion – lake is not tidal or coastal.
- Toilets are listed in the Russeltown car park, but these are not referred to in any of the reports given that there is no connections to the mains foul sewer system here.
- Site is hydrologically connected to Dublin Bay through the River Liffey.
- No credible visual impact statement considered for the proposed greenway. Over 7,000 trees will be felled, and visual impact of rock armour and road will be profound. Visual aspects of the area will change from a natural shoreline to a

manmade reservoir area surrounded by concrete and rock armour.

Assessment of visual impact is sincerely lacking in depth, scope, consideration and credibility.

- Laying over 33km asphalt road will generate significant pollution for the SPA and construction and operational phases. Roadways are a source of physical, chemical, biological and noise pollution. It is remiss to state that the 33km asphalt roadway around the perimeter of the SPA, over 3.5km of rock armour in the SPA, and the felling of over 7000 trees will have no impact on the SPA. White clawed crayfish are vulnerable to fine particles of sediment in the water, and this is a prey species of otter.
- Replanting of trees equivalent to the number being cut down may not provide adequate compensation for the loss of mature woodland habitat.
- Gradients along certain sections do not make the greenway universally accessible.
- Existing boardwalks are not sufficiently wide enough for walkers and cyclists passing each other.
- Forecasting based on the Waterford Greenway undermines the transport assessment and peak times are at odds with all other commuting areas around the country.
- Public money should not be spent on greenway link road to Tulfarris hotel. This is a small, narrow unsuitable road.
- There is no road crossing provisions on the N81 from Russeltown car park to Russborough House.
- Cycle track runs along the main carriageway through Blessington, which can be extremely busy during the day, and this poses a risk for cyclists and other users of the proposed greenway.
- Public consultation process was not as truthful or friendly as WCC would like to convey.
- Lack of proposed toilets.
- No consideration given in the archaeological report to where the water has stripped the topsoil in places which puts the archaeology closer to the surface.

- Increased potential for crime in the area.
- There will be issues of increased travel time for residents, traffic build up, and access for emergency services with the proposed layout at the bridges.

195. *Veronica Reid, Rockypool Villas*

- Objects for reasons relating to lack of consultation, road safety on Rockypool Villas, removal of parking on Blessington Main Street, increased traffic volumes, traffic lights on bridges, the current state of the road surface, and invasion of privacy.

196. *Victoria Doyle & Stuart Hayes, Annacorney, c/o Ivor Fitzpatrick & Co.*

- This submission has similar content to that lodged on behalf of Brian Kingham and summarised at No. 32 above. The main points raised also relate to the misdescription of the proposed development; designations in the Wicklow County Development Plan; failure to complete a final design; Habitats Directive; QI Greylag Goose and Lesser Black-backed Gull; Poulaphouca Reservoir SPA; EIA; failure to carry out preliminary examination for EIA; likely significant effects; absence of toilets on the Greenway; land ownership; miscellaneous matters; SPA boundary; recreational disturbance; protected species under EU Habitats Directive; bat protection; no proper field surveys; aquatic survey; hydrocarbon pollution; public consultation; and sustainable development.
- Appendix 1 of the submission includes examples of landowner property demarcation.
- Appendix 2 sets out information that forms the content of other submission (inconsistencies in information provided for responses to the further information response; hydrological connection to Dublin Bay; lack of visual impact statement; issues with safety on parts of the greenway; deficiency in consultation process; lack of proposed toilets; archaeological issues; potential for increased crime in the area; issues with proposed new layout of bridges; proposed development needs to be re-routed; screening of property; emergency entrance outside observer's property; single lane bridge outside observer's property; right of access from observer's property to lake; working apiary at observers property; and construction entry right beside observer's home.

- Appendix 3 discusses the bird survey carried out by John Lovatt and Steve Millar.

197. *William & Marion Miley, Baltyboys*

- Objects for reasons relating to the proposed traffic lights on bridges, lack of consultation, the proposed link to Tulfarris, safety and security.
- Not anti-greenway but believe locals should have been consulted.

198. *Yvonne Foster, Valleymount*

- Objects to proposals for bridges, emergency vehicle access, traffic surveying, lack of toilets and bins, trespassing, felling of trees, impact on property taxes, inadequate fencing, inconsistent width of ESB land around the lake, inadequate car parking, removal of parking and proposals for Blessington Main Street, anti-social behaviour, and proposed link to Tulfarris.
- Would take someone over 8 hours to walk around the lakes – Blessington to Poulaphouca to Tufarris (as their own expense) would be a much better plan.

199. *Yvonne Kelly-Amberley*

- Supports proposed greenway for its potential to attract tourism; positive impact on the local economy; and promotion of health and well-being.



## 17.0 Appendix 6 – EIA Screening (Form 3)

A. CASE DETAILS		
<b>An Bord Pleanála Case Reference:</b> <b>ABP-312479-22</b>		
<b>Development Summary</b>	Blessington Greenway consisting of approximately 33 kilometres of walking and cycling paths that travel around Poulaphouca Reservoir/Blessington Lake.	
	Yes / No / N/A	Comment (if relevant)
<b>1.</b> Was a Screening Determination carried out by the PA?	Yes	Wicklow County Council decided EIA not required
<b>2.</b> Has Schedule 7A information been submitted?	Yes	EIA Screening Report does not clearly and unambiguously state that it is Schedule 7A Information. However, I am satisfied that this document contains the relevant information to carry out a screening determination.
<b>3.</b> Has an AA screening report or NIS been submitted?	Yes	
<b>5.</b> Have any other relevant assessments of the effects on the environment which have a significant bearing on the project been carried out pursuant to other relevant Directives – for example SEA	Yes	Archaeological Impact Assessment, Arboricultural Impact Assessment, Outline CEMP, EIA Screening and EIA Screening Determination, Ecological Impact Assessment, Ecological constraints mapping, Flood Risk Assessment, Traffic and Transport Assessment, Fauna Report, Annex 1 Habitats and Rare Flora Report, Proposals for Monitoring Bird Disturbance, Climate Impact Assessment, Briefing

		Note on Archaeological Mitigation, Stage 1 Road Safety Audit, Quality Audit, Technical Note on Parking Arrangements at Blessington Main Street, Outline Management and Maintenance Plan, Monitoring and Evaluation Plan, Blessington Car Park Drainage Summary, Spatial Extent of Habitats Lost & Woodland Restoration and Bat Report.	
<b>B. EXAMINATION</b>		<b>Where relevant, briefly describe the characteristics of impacts ( ie the nature and extent) and any Mitigation Measures proposed to avoid or prevent a significant effect</b>  (having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact)	<b>Is this likely to result in significant effects on the environment?</b>  <b>Yes/ No/ Uncertain</b>
<b>1. Characteristics of proposed development</b> (including demolition, construction, operation, or decommissioning)			
<b>1.1</b> Is the project significantly different in character or scale to the existing surrounding or environment?		The shoreline of the reservoir is mostly planted with conifer trees and there is a worn path through trees used by hikers. Rock armour is in place along sections of the shoreline. There is an existing section of greenway mostly through wooded areas that will be upgraded. The main element of the proposed development is a new 3m wide tarmac pathway around the lake that would not be of a scale or character significantly at odds with the surrounding usage or pattern of development.	<b>No</b>

<p><b>1.2</b> Will construction, operation, decommissioning or demolition works causing physical changes to the locality (topography, land use, waterbodies)?</p>	<p>Construction works will require shallow excavation (maximum depth of 200 mm - 300 mm), tree removal and replacement, placement of culverts, single span bridges over larger streams, fencing and minor landscaping. There will be some alteration of levels at a local level and improved access will intensify the use of the proposed greenway around the lakeshore for leisure purposes. Traffic is expected to increase; however, it has been demonstrated that the surrounding road network is capable of accommodating the traffic generated by the proposed development.</p> <p>During construction, standard measures to address potential impacts on water and groundwaters in the locality will be implemented. There is uncertainty in the absence of detailed information on the impact of the proposed development during its operational phase on water quality within watercourses leading to the reservoir and the reservoir itself. There is also uncertainty regarding the impact of the proposed tree felling operations on water quality. However, with the application of appropriate measures, it is likely that these impacts could be mitigated by way of condition.</p> <p>Demolition works associated with the proposed development will be limited and it is envisaged that the proposed greenway will become a permanent feature and therefore no decommissioning impacts will occur.</p>	<p><b>Uncertain but could be mitigated by way of condition</b></p>
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<p><b>1.3</b> Will construction or operation of the project use natural resources such as land, soil, water, materials/minerals or energy, especially resources which are non-renewable or in short supply?</p>	<p>In terms of land take, the proposed development covers an area of 15.86 hectares, with an additional 3.34 hectares required for earthworks. The urban cycle paths/footpath improvement involve an area of 10,957 m<sup>2</sup> (1.2 km). The new car parking areas involve an area of 1,690 m<sup>2</sup> while the refurbishment of existing car parking areas involves an area of 7,436 m<sup>2</sup>. All imported materials will be sourced from licensed suppliers and where possible cut/fill will be balanced so the impact is not likely to be significant. It is assumed a water supply will be required during the construction phase.</p>	<p><b>No</b></p>
<p><b>1.4</b> Will the project involve the use, storage, transport, handling or production of substance which would be harmful to human health or the environment?</p>	<p>Yes, during the construction phase. A health and safety plan will be put in place.</p>	<p><b>No</b></p>
<p><b>1.5</b> Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?</p>	<p>Yes, during the construction phase. Waste management (including CDWMP) shall form part of the overall CEMP for the construction phase and will contain a number of control measures for the management of waste generated on the proposed development site.</p>	<p><b>No</b></p>
<p><b>1.6</b> Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</p>	<p>No risk of contamination of land but uncertainty with regards to the release of pollutants into surface waters. With the application of appropriate measures, it is likely that these impacts could be mitigated by way of condition.</p>	<p><b>Uncertain but could be mitigated by way of condition</b></p>

<p><b>1.7</b> Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?</p>	<p>There is potential for construction activity to give rise to noise and vibration emissions. Such emissions will be localised and short term in nature, and their impacts would be suitably mitigated by the operation of standard measures listed in the CEMP. There will be no lighting on the greenway at night time.</p>	<p><b>No</b></p>
<p><b>1.8</b> Will there be any risks to human health, for example due to water contamination or air pollution?</p>	<p>Application of standard measures within the CEMP would address some of the potential risks on human health from water pollution during construction. There is uncertainty with regards to the potential impact on drinking water quality in the reservoir through surface water run-off, drainage proposals, lack of toilet facilities, dog fouling, the use of tarmac and rock armouring, and tree felling in proximity to streams. However, with the application of appropriate measures, it is likely that these impacts could be mitigated by way of condition. Uisce Éireann is generally supportive of the proposal subject to clarification of a number of issues to ensure protection of the drinking water source.</p>	<p><b>Uncertain but could be mitigated by way of condition/ clarification.</b></p>
<p><b>1.9</b> Will there be any risk of major accidents that could affect human health or the environment?</p>	<p>No significant risk is predicted having regard to the nature and scale of the development. Any risk arising from construction will be localised and temporary in nature. It is recommended that flood forecasting is carried out and water alert stations installed as necessary.</p>	<p><b>No</b></p>

<p><b>1.10</b> Will the project affect the social environment (population, employment)</p>	<p>It is anticipated that the proposed development will promote health and well-being and will support the local economy.</p>	<p><b>No</b></p>
<p><b>1.11</b> Is the project part of a wider large scale change that could result in cumulative effects on the environment?</p>	<p>There is potential for the proposed greenway to act in-combination with other proposed developments around the lakeshore by increasing activity when SCI bird species are roosting on the lake at dawn and periods leading up to dusk. However, the trigger for significant effects is more stringent for Appropriate Assessment where complete, precise and definitive findings are required to underpin a conclusion that no reasonable scientific doubt remains as to the absence of any identified potential detrimental effects on a protected site having regard to its conservation objectives.</p> <p>There is potential for different elements of the proposed development to act cumulatively to give rise to significant climatic impacts. This includes tree felling, increased traffic emissions, and construction emissions. It is expected that the release of carbon from tree felling will be recouped over the lifetime of the proposed replanted trees and that transport related emissions will reduce over time. The climate impact assessment captured all significant embodied carbon associated with the proposed</p>	<p><b>No</b></p>

	development including materials and products. The majority of construction related emissions relate to tree removal. The overall cumulative impact on climate is not considered to be significant.	
<b>2. Location of proposed development</b>		
<b>2.1</b> Is the proposed development located on, in, adjoining or have the potential to impact on any of the following: <ul style="list-style-type: none"> <li>a) European site (SAC/ SPA/ pSAC/ pSPA)</li> <li>b) NHA/ pNHA</li> <li>c) Designated Nature Reserve</li> <li>d) Designated refuge for flora or fauna</li> <li>e) Place, site or feature of ecological interest, the preservation/conservation/ protection of which is an objective of a development plan/ LAP/ draft plan or variation of a plan</li> </ul>	<p>The proposed development encircles and encroaches upon the Poulaphouca Reservoir SPA. Poulaphouca Reservoir is also designated as a pNHA. The Wicklow Mountain SAC and the Wicklow Mountains SPA are approximately 300m from the proposed greenway. There are objectives in the current Wicklow County Development Plan for the protection of places, sites or features of ecological interest.</p> <p>Uncertainty as to the impacts of the proposed development on the water environment and its potential to give rise to disturbance impacts on special conservation interest bird species.</p>	<b>Uncertain – however, the trigger for significant impacts under the Habitats Directive is lighter than the EIA Directive. This is assessed under the Appropriate Assessment.</b>
<b>2.2</b> Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, for example: for breeding, nesting, foraging, resting, over-wintering, or migration, be significantly affected by the project?	<p>Uncertainty as to the impacts on foraging and over-wintering SCI bird species from potential disturbance/ displacement impacts. Uncertainty as to the impacts on water quality and the habitat and prey species of otter and SCI bird species.</p>	<b>Uncertain – as above re. Habitats Directive</b>

<p><b>2.3</b> Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?</p>	<p>The potential impacts on the local archaeological resource (consisting of recorded and as yet previously undiscovered archaeological sites and features) through destruction of sites, features or deposits during construction or impacts upon sites, features or deposits to gain site access.</p> <p>Archaeological monitoring of all groundworks will be carried out where deemed appropriate and a condition reflecting same and as recommended by the Department will be attached to any grant of permission .</p>	<p><b>No</b></p>
<p><b>2.4</b> Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, for example: forestry, agriculture, water/coastal, fisheries, minerals?</p>	<p>Proposed Development is located adjacent to the Poulaphouca Reservoir, which is the most extensive inland water body in Wicklow and is an active reservoir for both water supply and electricity generation; this could be impacted during the construction and operational phases of the proposed development. Standard mitigation measures are proposed to address potential impacts on water quality during the construction phase. Additional mitigation is required to ensure that tree felling operations do not impact on water quality. Operational phase impacts on water quality will require appropriate mitigation measures.</p> <p>Most high quality woodland around the route of the proposed development is typically small in size and discontinuous. Mitigation measures to</p>	<p><b>Uncertain but could be mitigated by way of condition</b></p>



	prevent impacts to woodlands should be set out in the CEMP.	
<b>2.5</b> Are there any water resources including surface waters, for example: rivers, lakes/ponds, coastal or groundwaters which could be affected by the project, particularly in terms of their volume and flood risk?	The proposed development will not contribute to increased flood risk. The level of the reservoir is controlled by ESB for both power generation and water supply purposes.	<b>No</b>
<b>2.6</b> Is the location susceptible to subsidence, landslides or erosion?	The shoreline of the reservoir is susceptible to erosion and the placement of rock armour around certain sections is intended to address this issue.	<b>No</b>
<b>2.7</b> Are there any key transport routes(eg National primary Roads) on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No works are proposed on National Primary Roads and the Traffic and Transport Assessment accompanying the planning application concludes that the surrounding road network can adequately accommodate the traffic volumes generated by the proposed development.	<b>No</b>
<b>2.8</b> Are there existing sensitive land uses or community facilities (such as hospitals, schools etc) which could be significantly affected by the project?	The proposed development will result in some loss of agricultural land and conifer plantation. Given the scale of the forest and agricultural land being lost, when compared to the amount of forestry and agricultural land available in the wider area, the reduction of land available is not considered significant.	<b>No</b>
<b>3. Any other factors that should be considered which could lead to environmental impacts</b>		
<b>3.1 Cumulative Effects:</b> Could this project together with existing and/or approved development result in cumulative effects during the construction/ operation phase?	No existing or permitted developments have been identified in the immediate vicinity that would give rise to significant cumulative environmental effects within	<b>No</b>

	<p>the subject project. There is uncertainty as to the potential for the proposed greenway to act in - combination with other proposed developments around the lakeshore by increasing activity when SCI bird species are roosting on the lake at dawn and periods leading up to dusk and this is addressed under Appropriate Assessment, which applies a more stringent trigger for significant effects.</p> <p>No significant cumulative effects by way of emissions arising from the different elements of the proposed development on climate.</p>	
<b>3.2 Transboundary Effects:</b> Is the project likely to lead to transboundary effects?	<b>No</b>	<b>No</b>
<b>3.3</b> Are there any other relevant considerations?	<b>No</b>	<b>No</b>
<b>C. CONCLUSION</b>		
No real likelihood of significant effects on the environment.	Agreed	EIAR not required.
Real likelihood of significant effects on the environment.		
<b>D. MAIN REASONS AND CONSIDERATIONS</b>		
<p>The proposed development it is not a development type for the purposes of Part 10 listed in Schedule 5 of the Planning and Development Regulations, 2001 (as amended) and does not fall under any mandatory or prescribed type of road development pursuant to Section 50 of the Roads Act, 1993 (as amended) that requires the preparation of an EIAR. Under Section 68 of the Roads Act, 1993 (as amended), a “cycleway” means a public road or proposed public road reserved for the exclusive use of pedal cyclists or pedal cyclists and pedestrians. The likelihood of the proposed sub-threshold development having significant effects on the environment therefore needs to be considered and to identify if EIA is required.</p> <p>Notwithstanding the features and measures proposed by the applicant to avoid or prevent significant effects on the environment, there is some uncertainty as to whether the proposed development would be likely to have significant effects on the water environment. However, with the application of full and proper mitigation measures, it is considered that the proposed development would not be</p>		

likely to have significant effects on the wider environment, including the water environment, and that the preparation and submission of an Environmental Impact Assessment Report would not, therefore, be required.

It has been determined under the Stage 2: Appropriate Assessment that in the absence of detailed information on the impact of the proposed development on water quality, the possibility of adverse effects on the integrity of the Wicklow Mountains SAC and the Poulaphouca Reservoir SPA having regard to the reliance of SCI species on the water environment cannot be ruled out. The Board will note that the trigger for Appropriate Assessment is more stringent than for Environmental Impact Assessment and that post-consent mitigation cannot be applied.

Inspector \_\_\_\_\_

Date \_\_\_\_\_

Approved (DP/ADP) \_\_\_\_\_

Date \_\_\_\_\_