



# Observation on a Strategic Infrastructure Development Application

## Observer's details

### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.  
If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

(b) Observer's postal address

## Agent's details

### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.  
If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

(b) Agent's postal address

## Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**  
(for example: 300000)

312479

- (b) **Name or description of proposed development**

Blessington eGreenway

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Blessington Co Wicklow with route around Poulaphouca Reservoir via Lacken, Ballyknockan, Blessington , Haylands , Knockieran Lower, Knockieran Upper, Carrig, Sroughan, Lacken, Ballynastockan, Ballyknockan, Carrigacurra, Annacarney, Valleymount, Monamuck, Humphrystown , Baltyboys Upper, Baltyboys Lower, Burgage Moyle, Russellstown, Russborough, Rathballylong, Tulfarris, Glebe East, and Burgage More and passing adjacent to the villages of Valleymount, Ballyknockan and Lacken before returning to Blessington at Knockieran Bridge.

## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

1. Traffic control using traffic lights on the three bridges serving the hinterland of Blessington to the east – Knockieran Bridge, Baltyboys Bridge, Vallemount Bridge – reducing the existing two lanes to 1 for vehicles, 1 for cyclists, and 1 for pedestrians. Significant impairment of life throughout the area is envisaged, affecting agriculture, forestry, business, personal, schools, emergency vehicles.

There are questions over the adequacy of the traffic modelling and underlying figures used by Wicklow County Council in adopting this approach.

2. Lack of detail on the provision of adequate fencing along the entire route to protect local farmers livestock and land.

3. Lack of confidence that there will be adequate parking and associated facilities along the route based on the projected number of visitors to the facility.

4. The removal of a significant number of trees along the proposed route is planned; however, it is unclear that these will be replaced with (semi) mature broadleaf native species and over what period.

5. Inadequate proper public consultation.

6. Lack of provision of toilet facilities along the route bearing in mind that little or no cafes, shops, pubs etc exist along the route

6. Effect of Greenway on Main Street, Blessington with the proposed removal of disabled parking and other parking spaces.

## 5. Grounds

1. Lack of adequate and timely consultation with the local community about the proposal to restrict traffic on bridges. with no indication of the analysis that lead to this decision.
2. No indication has been provided on any analysis that was carried out in coming to this conclusion. Locally, it is felt that these bridges are approaching end of life, being of concrete/steel construction and in excess of 80 years old. No alternatives have been offered such as the use of cantilever structures to take pedestrians and cyclists.
3. The proposed development will seriously affect the daily lives of the farming community, forestry, local people etc. as large agricultural vehicles will not be able to use the reduced bridges.
4. Locally it is expected that the projected increase of traffic into Blessington and district will be larger than planned for. We also note that vehicular figures used as an input to the model were measured during lockdown!
5. It is suggested that the reduction in the bridge capacity will have an impact on Emergency Vehicles trying to cross, especially at busy periods.

Please see [Attachment to this Observation](#).

## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.
- **Please see Attachment to this Observation.**

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

## Fee

7. You **must** make sure that the correct fee is included with your observation.

### **Observers (except prescribed bodies)**

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

## Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

**Yes, I wish to request an oral hearing**

**No, I do not wish to request an oral hearing**

## Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

**For Office Use Only**

<b>FEM – Received</b>		<b>SIDS – Processed</b>	
Initials		Initials	
Date		Date	

**Notes**

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Where nature and history meet



c/o nnnn  
Co Wicklow  
☎ nnnn

blessingtondistrictforum@blessington.ie

www.blessington.ie

4 March 2022

An Bord Pleanála  
64 Marlborough Street  
DUBLIN 1

Dear Sirs,

**Attachment to SID Observation  
Case JP27.312479 – Blessington eGreenway**

**A. INTRODUCTION**

A1. Blessington and District Forum (BDF) is a voluntary community body located in Blessington, Co Wicklow, and has been active in the area since 2001. We operate in the sphere of community and societal development, planning, town development, and environmental issues. To this end, we maintain close ties with Wicklow County Council, being a member of Blessington Town Team, and with other relevant statutory bodies. Further information is available on our website [www.blessington.ie](http://www.blessington.ie).

A2. BDF is fully in favour of initiatives which promote local development with its attendant employment, commercial, and societal benefits. We strive to ensure that all such developments are carried out in a sustainable manner and do not degrade the environment and overall living conditions of the local population. This can take many forms, for example, traffic volumes and traffic types, water quality, noise, dust, odour, and air pollution. Coupled with this is an expectation that the developer will behave responsibly in protecting the above environmental features and abides by whatever conditions may be attached to the approval.

A3. Being a community-based organisation, BDF, at all times, strives to reflect the views of the local community insofar as these are deemed to be reasonable, informed, and are seen to be in compliance with statutory requirements in the areas of good planning, health and safety needs, and overall promoting the common good. To this end we have listened to the views of the local community during several local meetings and have striven to reflect them in this Observation.



A4. BDF was an early initiator of a Greenway for Blessington and, to this end, launched Phase 1 in 2014. This is 6.5Km in length and extends from Blessington to Russelstown. This is now a well-used facility and its upgrade and amalgamation into the eGreenway is welcomed.

## **B. OBSERVATIONS ON ABP CASE 312479**

B1. There is a significant level of disquiet in Blessington and District in connection with this application. These are listed below, some being more serious than others. These are:

- Degree of proper public consultation by Wicklow County Council;
- Traffic management on Bridges and issues arising;
- General Traffic analysis arising from use of eGreenway;
- Boundary fencing to adjacent farmland;
- Removal and replacement of Trees;
- Parking facilities;
- Toilets along the 33Km route
- Ongoing management

### B2. Public Consultation

The arrival of the eGreenway is of significant strategic importance to Blessington and District and has been anxiously awaited since the original Phase 1 route (6.5Km) indicated how important it was as a recreational and healthy addition to the fabric of Blessington and West Wicklow, and the economic opportunities we expect it will bring to the local area.

The planning and development of the additional 33Kms has been ongoing for a number of years within WCC. The onset of Covid-19 in 2020 added a further two years to the overall timescale as currently announced. This period, including the additional two years, could, and should, have been used by WCC to copper-fasten its understanding of any local needs and concerns and to have them reflected in the planning documents.

To the best of our knowledge, this was not done and remains an opportunity lost, resulting in the current disquiet. To be fair, WCC did give a series of information updates to Blessington and District Forum and other bodies but this was more of an information release than consultation.

The public and local organisations should have been properly consulted by Wicklow County Council from day 1, in particular on aspects that changed from the original Part 8 application which was widely welcomed and supported by the local communities.

### B3. Traffic Lights on Bridges

It was not until the submission by WCC to ABP of the eGreenway application that it became generally known that the three bridges in the area – Knockieran, Vallemount, Baltyboys - were to be controlled by traffic lights.

There is NO discernible agreement in the area to this.

These bridges are reinforced concrete structures dating from the late 1930s when the valley was flooded to create the Poulaphouca Reservoir. It should also be noted that each of these were reinforced across the complete span on both sides approx. twenty years ago; this left little or no space for a pedestrian footpath on either side. Consequently, pushchairs with children, wheelchairs and the like must use the carriageway AT THIS MOMENT, plus a car and agricultural machine would have difficulty in passing even on the existing two lanes!

The question arises as to why it was considered necessary twenty years ago to strengthen the bridges and what data was used to inform this decision. Have these bridges reached 'end-of-life'? Can WCC or ESB provide ABP with the maintenance history of these bridges? Who owns them?

Blessington & District Forum has identified a number of possible scenarios for the bridges as the proposal currently stands, namely

1. No change;
2. New bridges of adequate dimensions;
3. Provide a cantilever 'boardwalk' on either side for pedestrian or cycle traffic respectively.
4. The approach outlines in the submission of single carriage way

Option 1, given the projected numbers expected to use the eGreenway, is not acceptable from a safety point of view. Option 2 will solve the problem but this a much longer term endeavour and will not solve the current problem. Option 3 is attractive and WCC (and/or ESB) must explain why it cannot be done. Option 4 is least attractive and is what causes the greatest concern in the local community.

The proposal from Wicklow County Council must not inflict significant impairment on normal life throughout the area, affecting agriculture, forestry, business, personal, schools, emergency vehicles, not to mention potential gridlock in the town of Blessington, already suffering from a lack of properly planned and located parking facilities. However whatever decision is eventually adopted, pedestrian safety must be a core element of it.

#### B4. Traffic Analysis and Management

It is felt that the projected visitor numbers may exceed what has been projected. Additionally, the traffic measurements used in the modelling were carried out during Covid lockdown, a period of greatly reduced activity and then extrapolated. WCC must show that this is an acceptable approach and, if need be, conduct a more realistic traffic survey to confirm what is stated in the Application.

In the absence of this confirmation, or other supporting documentation, the Application must be considered to be flawed.

#### B5. Boundary Fencing

Wicklow County Council, in its Project Description, indicates that the works will include 'fencing'; however, this is not further detailed within the documentation submitted.

The document 'Code of Best Practice: National and Regional Greenways' of December 2021 - as agreed between all the relevant statutory parties, including the IFA - calls for fencing to be stock proof, that is, capable of containing cattle and sheep. However, there is a requirement for the farmer/landowner to be assured that dogs on the Greenway will not be able to approach their stock on the other side and will be prevented through of suitable fence of adequate height and strength.

WCC needs to provide assurances, by way of detail, that this will be provided.

#### B6. Removal and Replacement of Trees

There are plans to remove a significant number of trees in the Application, and as the plan states, these existing trees offer minimal to no value to wildlife and biodiversity. We are happy to see that all trees will be replaced with a native broadleaf tree and are very supportive of this activity. In an ideal world, the full route would be surrounded with native broadleaf trees. A greener Greenway will only serve to enhance people's experiences.

However, we request that ABP make some recommendations and conditions on tree replacement, namely:

- That in areas along the route where tree planting can commence that it starts with immediate effect from the first planting season after permission has been granted so that tree lines can be allowed to establish more quickly.
- That an agreed percentage (~10%) of replacement trees are of a more mature size that will allow for an immediate positive impact on the local landscape and support an immediate creation of wildlife habitat and corridors.

- As part of the planting that WCC in conjunction with the local communities organise some community tree planting days.
- That in cases where large native species such as Oak are in situ [Russelstown Harbour to Russborough spur] that they are not removed and the path is rerouted around these native and mature species.
- It should be a condition that an ecologist remains engaged throughout the project to monitor works and ensure care is taken to protect existing biodiversity, with particular attention to species.

#### B7. Parking Facilities

In the Application, the Design Statement details only an additional 50 spaces at Knockieran with an additional 50 spaces at Russelstown, that is, and additional 100 car parking spaces for the entire 33Kms. Drinking water, charging points etc are also to be provided at Lacken, Valleymount, Baltyboys, and Russelstown.

It is possible that these additions, and their location, may be adequate for the initial influx of visitors. However, WCC must have contingencies in place so that further spaces can be readily and quickly provided at all the locations at short notice – Knockieran, Lacken, Valleymount, Baltyboys, Russelstown and Burgage More [the Avon].

It is suggested that WCC should have taken a holistic view of Blessington in the formulation of this Application, particularly with respect to the direct effects on the town itself in the areas of pavement enlargement and parking. As proposed, the Application results in the loss of some parking, including spaces outside a doctor's surgery, due to the need to enlarge the footpath. However, WCC should have been aware of the possible future availability of RRDF funding for Blessington which would enable the complete re-furbishment and modernisation of Main Street, with possible partial pedestrianisation. Should this happen, and we are confident it will, then some of the civil works completed as part of the eGreenway will need to be re-worked.

#### B8. Other Facilities – Toilets, Signage & Lighting

Toilets – it is noted that there is no mention of toilets throughout the length of the eGreenway. This would be normal in continental and British greenways where there may be plenty of cafes, pubs etc along the route. This is not the case with the Blessington eGreenway where, with the exception of Blessington itself, there are little or no such units along its entire length. This should be revisited, not least in the interests of hygiene and personal privacy.

Signage – there seems to be adequate provision for information signage and this is welcomed.

Lighting – in the case of all lighting being added along the route, it should be in line with the most recent recommendations at the time of construction to ensure minimal disruption to residents and wildlife. This should include considerations to luminance, colour, placement, and direction of light flow, in accordance with statutory directives.

B9. Ongoing Management

It is the view of Blessington & District Forum that the planning, design, and implementation of strategic infrastructure such as the Blessington eGreenway should make reference to the ongoing maintenance of the facility. While it is not suggested that this Application should contain a Maintenance Plan, it should be part of any Approval that such a document must be completed prior to opening and its provisions should and must comply with statutory guidelines.

**C. CONCLUSION**

Blessington & District Forum is pleased to place these Observations before An Bord Pleanála.

We confirm that, while we fully endorse the concept of a Blessington Greenway, it is nevertheless our view that some omissions and flaws exist in the current Application.

We further confirm that we will work with all other stakeholders in seeking resolutions to these omissions and flaws. To this end, Blessington & District Forum is seeking an oral hearing in order to clarify our views further and we remain available to participate in such an event.

It is hoped An Bord Pleanála will consider this Observation by Blessington & District Forum in its determination of the best way forward

Yours sincerely



Carmel Cashin

Chairperson - Blessington & District Forum  
Forum



Jason Mulhall

Secretary – Blessington & District