

DRAFT RATHDRUM LOCAL AREA PLAN 2017

CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS MADE TO DRAFT PLAN



Wicklow County Council
March 2017

PART I: INTRODUCTION

1.1 Introduction

This Chief Executive's Report is submitted under Section 20(3)(c) of the Planning and Development Act 2000 (as amended). It is part of the formal statutory process of the preparation of a Local Area Plan. This Report contains the following:

- i. a list of the persons or bodies that made submissions,
- ii. a summary of the issues raised by them,
- iii. the opinion of the Chief Executive in relation to the issues raised, and his recommendations in relation to the proposed LAP, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

In accordance with Section 20 (3)(cc) this report is required to summarise the issues raised and the recommendations made by the NTA and outline the recommendations of the Chief Executive in relation to the manner in which these issues and recommendations should be addressed in the proposed local area plan. Please note however that no submission has been received from the NTA.

The members of the planning authority are required to consider the proposal to make the local area plan and this report of the Chief Executive.

1.2 Next steps

Following consideration of this Chief Executive's Report, the local area plan shall be deemed to be made in accordance with the recommendations of the Chief Executive as set out in this Report, **6 weeks after the furnishing of the report to the members**, unless the planning authority, by resolution, decides to either

- (i) make or amend the plan otherwise than as recommended in this report, or
- (ii) not make the plan.

Where, following consideration of the Chief Executive's Report, it appears to the members of the authority that the Draft LAP should be altered, and the proposed alteration would if made be a material alteration of the draft LAP, the Planning Authority shall, not later than 3 weeks after the passing of a resolution publish notice of the proposed material alteration in one or more newspapers circulating in its area, and send notice of the proposed material alteration to the Minister, the Board and the prescribed authorities (enclosing where the authority considers it appropriate a copy of the proposed material alteration).

In the event that material amendments to the draft plan are proposed, the planning authority shall determine if a Strategic Environmental Assessment or Appropriate Assessment, as the case

may be, is or are required to be carried out as respects one or more than one proposed material amendments to the Draft LAP.

The Chief Executive shall, not later than 2 weeks after a determination that SEA/AA of a material amendment is required, specify such period as he or she considers necessary following the passing of the resolution, as being required to facilitate an assessment. The planning authority shall carry out an assessment required of the proposed material amendment of the draft local area plan within the period specified by the Chief Executive.

The planning authority shall publish notice of the proposed material amendment, and where appropriate in the circumstances, the making of a determination that a SEA/AA is required. The planning authority shall carry out the assessment within the period specified by the Chief Executive.

The notice relating to material amendments shall state –

- i. that a copy of the proposed material amendment and of any determination by the authority that a SEA/AA is required may be inspected during a stated period of not less than 4 weeks, and
- ii. that written submissions or observations with respect to the proposed material amendment and of any determination by the authority that a SEA/AA is required, may be made to the planning authority and shall be taken into consideration before the making of any material amendment.

1.3 Consultation Process & List of Submissions

The Draft Rathdrum Local Area Plan 2017-2023 was on public display during the period 6th February 2017 to 20th March 2017. During this period, a total of 9 submissions were received.

Group 1 Prescribed bodies

No.	Organisation	Representative
1	Department of Education & Skills	Veronica Kelly
2	EPA	Cian O'Mahony
3	Irish Water	Matthew Collins

Group 2 Public submissions (individual)

No.	Surname	Forename
4	Armstrong	Leslie
5	Hobson	John
6	Naidoo	Naomi
7	Ryan	Paul
8	Smith	Padraig

Group 3 Public groups

No.	Group	Representative
9	Parnell Athletics Club	Martin Breen

**PART II: SUMMARY OF ISSUES RAISED AND CHIEF EXECUTIVE'S OPINION
AND RECOMMENDATION ON THESE ISSUES RAISED**

Section 3.1 PRESCRIBED BODIES

Prescribed Body
Department of Education & Skills
Submission Number
1
Summary of Issues Raised
<p>The Department thanks WCC for the notification of the publication of the draft plan and indicates that their position with respect to educational needs in Rathdrum is as set out in their submission to the issues booklet of November 2016.</p> <p>Submission of Nov 2016:</p> <p><u>School provision</u></p> <p><i>It is important that there is sufficient educational infrastructure to meet the needs of the community. The Department has worked closely with the Council in relation to securing sites for educational infrastructure and the Department will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools and emphasises the critical importance of the Council ensuring sufficient land is zoned for this purpose.</i></p> <p><i>Schools may develop within the lifetime of the Local Area Plan. It is important that suitable sites, taking the documents referenced in appendix 2 of this submission into account, are zoned to cater for this provision. The Department requests that the Council consider including a specific school/education land use zoning objective and identify suitably located lands to meet the educational infrastructure needs within the Local Area Plan in accordance with Development Plans: Guidelines for Planning Authorities, Appendix F (DEHLG, 2007) and the Department of Education and Skills Technical Guidance Documents for primary schools and for post-primary schools.</i></p> <p><i>In this regard land should be zoned where provision of services and access will not hinder the development of the school within the required timeframe. The Council is requested to consider favourable implementation strategies and phasing in the identification of school specific sites in order to ensure ready access to existing infrastructure and to avoid the risk of disproportionate costs by the Department towards such infrastructure to benefit the receiving communities.</i></p> <p><i>The Department requests that site reservations are made, where possible, as close as possible to community facilities such as sports facilities, libraries etc. so that these can be shared between the school and the community. The Department is also open to the concept of multi-campus school arrangements, for example where two or three primary schools are located side by side or a primary school and a post primary school sharing the same site. Both of these approaches can have the effect of reducing the land take for school development.</i></p> <p><i>It would be strategically valuable for the educationally zoned lands to be placed beside open-space or green-belt zonings if possible, as this would allow ready access to these amenities and other aligned</i></p>

facilities by the schools and in the strategic long-term may future-proof these schools for possible future expansion should that be necessary.

Where possible, land adjacent to existing schools should be zoned appropriately to allow for the potential future expansion of these schools. In addition, the Council is requested to consider a policy of introducing a buffer zone around existing school sites, where possible. This would facilitate adequate separation from housing while allowing reasonable scope for increased school heights particularly in established neighbourhoods identified for consolidation or intensification of population.

Using the projected population targets published in the issues booklet (3,500 by 2028) and applying the information used to calculate educational infrastructure requirements as set out in Appendix 1, the last 2 columns of the table below outlines the number of primary classrooms and the number of post primary school places which would be required to meet the projected increase in population as set out in the issues booklet, if this level of population growth was to materialise.

Strategic Planning Area	2011 Population	2028 Population	Growth	National Primary School Going Average 12%	Potential Primary Classroom Requirement Based on PTR 27:1	National Post-Primary School going Average (8.5%) Deficit of Places
Rathdrum	1,638	3,500	1,862	223	8	158

The projected population targets referenced in the issues booklet provides figures for 2011 and projected figures for 2028. Five of these 17 years have already elapsed and the additional children will already be attending the existing primary and post-primary schools. Given the small number involved and the capacity of existing provision in the area it is expected that these projected numbers can be catered for in existing schools.

Programme of Capital Investment

A new programme of capital investment in schools, listing the school projects planned to go to construction during the years 2016 to 2021 was published on the 17th November 2015. For your information, the school projects in the Rathdrum area included on this programme are listed in Appendix 3 to this submission.

Please see appendix 1 for details in relation to how the Department calculates educational requirements based on demographic projections from the Council; references to technical guidance and other documents which relate to educational provision at appendix 2 and the projects included in the 6 year construction programme from 2016-2021 at appendix 3. All Technical Guidance Documentation used in the design of all new school buildings and extensions are available from the Department's website www.education.ie

Demographic changes in the Rathdrum area will continue to be monitored on an ongoing basis and it is possible that further educational requirements may arise over the lifetime of the Local Area Plan. Accordingly it is important that sufficient land is zoned for educational use.

Opinion of Chief Executive

The submission received in November 2016 was considered in the crafting of the draft plan, and it is considered that all of the Department's requirement have been met in the draft plan; in particular, adequate lands have been zoned for educational use (as detailed in Table 3.3 of the draft plan) in the event that school expansion / new school construction is required.

Chief Executive's Recommendation

No change

Prescribed Body
Environmental Protection Agency
Submission Number
2
Summary of Issues Raised
<p>1. SEA Determination EPA notes the determination with regard to the need for Strategic Environmental Assessment (SEA) of the Draft Rathdrum Local Area Plan for the period 2017-2023 (the Plan).</p> <p>2. Specific Comments on the Plan EPA acknowledges that their previous submission has been taken into account. In addition to the previous comments made, a number of additional comments are provided to also consider.</p> <ul style="list-style-type: none"> - The Plan should take into account Irish Water’s Capital Investment Programme, to ensure adequate and appropriate critical service infrastructure is provided to support the continued development of the Plan area. - EPA welcomes that a <i>Local Biodiversity Areas Report</i> (2006) for the plan area is being incorporated into the Plan. There may be merit in reviewing this report, to reflect more up to date information; references, guidance etc. (where available). This would assist in further protecting biodiversity and green infrastructure during the lifetime of the Plan. <p>3. EPA State of the Environment Report 2016 The EPA has recently published our latest ‘State of the Environment Report’ - <i>Ireland’s Environment 2016 – An Assessment (EPA, 2016)</i>. The recommendations, key issues and challenges described within this report should be taken into account, as relevant and appropriate to the Plan area. This report can be consulted at: http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/</p> <p>4. Future Amendments to the Draft Plan Wicklow County Council should determine whether or not any future proposed Variations would be likely to have significant effects on the environment. This assessment should take account of the SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004).</p>
Opinion of Chief Executive
<p>1. Noted</p> <p>2. The plan has taken into account the data supplied by Irish Water at the pre-draft consultation stage, as detailed in Section 3.7 of the draft plan. The following objectives of the Wicklow County Development Plan will apply in Rathdrum:</p> <p>WI1 <i>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 the provision of sufficient storage, supply and pressure of potable water to serve all lands zoned for development and in particular, to endeavour to secure the delivery of regional and strategic water supply schemes and any other smaller, localised water improvement schemes required during the lifetime of the plan.</i></p> <p>WI2 <i>To protect existing and potential water resources of the County, in accordance with the EU Water Framework Directive, the River Basin Management Plans, the Groundwater Protection Scheme and source protection plans for public water supplies.</i></p>

WI3 To require new developments to connect to public water supplies where services are adequate or where they will be provided in the near future.

WI4 Where connection to an existing public water supply is not possible, or the existing supply system does not have sufficient capacity, the provision of a private water supply will be permitted where it can be demonstrated that the proposed water supply meets the standards set out in EU and national legislation and guidance, would not be prejudicial to public health or would not impact on the source or yield of an existing supply, particularly a public supply.

WI5 To support Irish Water's proposed investment in the Vartry Water Supply Scheme, which is required to secure the existing supply for customers. The proposed upgrade works, subject to a full planning process, will likely comprise:

- Construction of a new water treatment plant on the site at Vartry and decommissioning the existing water treatment plant;
- Construction of a 4km pipeline to secure the transfer of treated water from Vartry to Callowhill pumping station;
- Upgrading the dam of the Vartry Reservoir.

WI6 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 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 development of a WWTP in Arklow, at an optimal location following detailed technical and environmental assessment and public consultation.

WI7 Permission will be considered for private wastewater treatment plants for single rural houses where:

- the specific ground conditions have been shown to be suitable for the construction of a treatment plant and any associated percolation area;
- the system will not give rise to unacceptable adverse impacts on ground waters / aquifers and the type of treatment proposed has been drawn up in accordance with the appropriate groundwater protection response set out in the Wicklow Groundwater Protection Scheme (2003);
- the proposed method of treatment and disposal complies with Wicklow County Council's Policy for Wastewater Treatment & Disposal Systems for Single Houses (PE ≤ 10) and the Environmental Protection Agency "Waste Water Treatment Manuals"; and
- in all cases the protection of ground and surface water quality shall remain the overriding priority and proposals must definitively demonstrate that the proposed development will not have an adverse impact on water quality standards and requirements set out in EU and national legislation and guidance documents.

WI8 Private wastewater treatment plants for multi-house developments will not be permitted.

WI9 Private wastewater treatment plants for commercial / employment generating development will only be considered where:

- Irish Water has confirmed the site is due to be connected to a future public system in the area or Irish Water have confirmed there are no plans for a public system in the area;

- it can clearly demonstrated that the proposed system can meet all EPA / Local Authority environmental criteria; and
- an annually renewed contract for the management and maintenance of the system is contracted with a reputable company / person, details of which shall be provided to the Local Authority.

W110 Where any application for a private treatment plant would require a discharge licence under the Water Pollution Acts, a simultaneous application for same shall be required to be made when submitting the planning application.

With respect to the LBA study, a review of this study was not part of the plan making process, as it is not a statutory document, but rather an advisory study, and it is acknowledged that it may not include references to all up to date legislation etc. However, all up to date legislation, standards etc have been utilised in the crafting of the Wicklow County Development Plan and this draft plan and it is considered that all relevant environmental criteria have been addressed.

3. The environmental protection and management provisions that will apply in Rathdrum are those set out in the County Development Plan 2016-2022 and the LAP itself along with the wide range of legislation, processes, strategies and policies that govern such areas as air quality, climate change, nature, inland and marine waters, waste, land and soil, health and well being, economic development, transport, energy, and agriculture. It is considered that the raft of objectives and actions already available adequately address all of the recommendations, key issues and challenges described in the EPA State of the Environment Report 2016 – namely (1) Valuing and protecting our natural environment, (2) Building a resource-efficient low-carbon economy, (3) Implementing environmental legislation and (4) Putting the environment at the heart of decision making – and no additional policies or objectives are required in this local area plan.
4. Noted.

Chief Executive’s Recommendation

No change

Prescribed Body

Irish Water

Submission Number

3

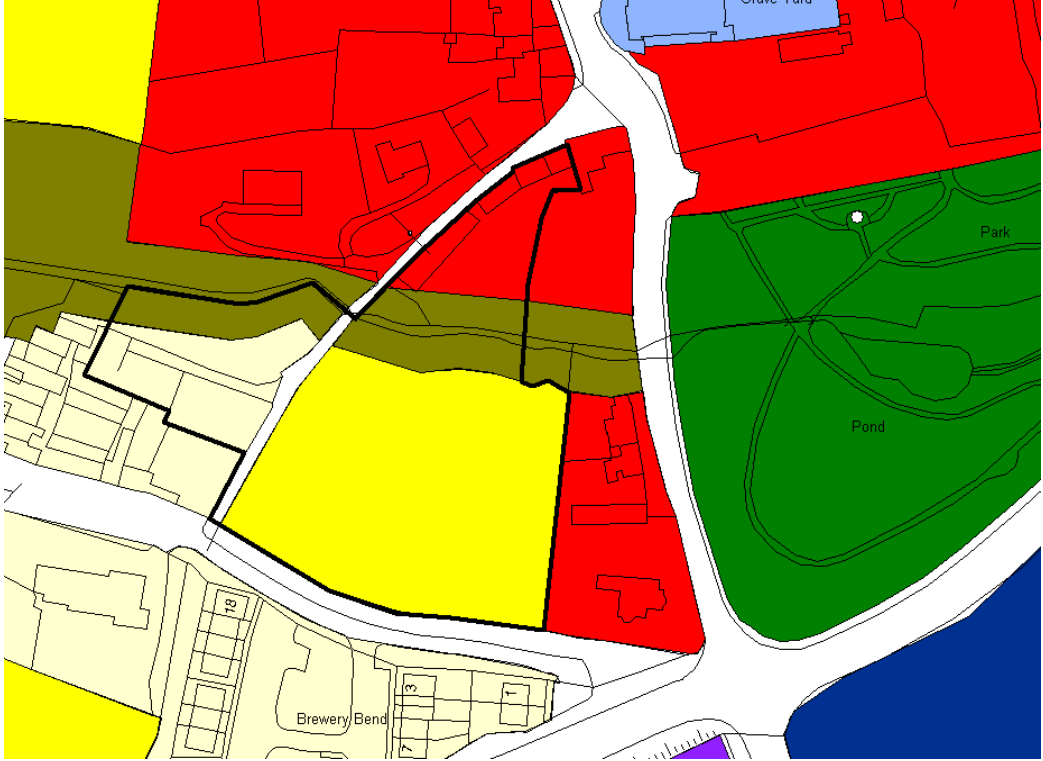
Summary of Issues Raised

Irish Water notes that population target of 2,843 for 2022 and the ‘housing stock requirement’ of 1,256 through an increase of 599 units. The draft LAP provides a housing capacity of zoned land including residential zoning of 1,040 units.

In relation to water supply, there are currently supply constraints in Rathdrum. To address this, the Water Supply Scheme (WSS) is currently included as part of the Mid Wicklow Water Supply Scheme Project with the intention of rationalising the existing water treatment plant and connecting the WSS to Vartry WTP. This project has an anticipated delivery date of 2019.

Opinion of Chief Executive
Noted; it is already noted in the plan that it is proposed to serve Rathdrum with a new supply from the Varry.
Chief Executive's Recommendation
No change

Section 3.2 PUBLIC SUBMISSIONS

Name
Leslie Armstrong
Submission Number
4
Summary of Issues Raised
<p>The submitter is the owner of lands situated to the west of Main Street as shown outlined in black on the map below and is requesting that the zoning of the entirety be changed to 'TC – town centre' :</p>

<p>Note: This is the best approximation possible from the freehand drawn map supplied.</p>
<p>The submission sets out the following information and requests:</p> <ol style="list-style-type: none">1. The land proposed to be zoned 'RE – existing residential' does not comprise part of existing residential area as there is no residential development on the lands;2. The lands satisfy the Council phasing requirement as set out on p13 of the draft plan; the lands are situated in the town centre and within walking distance of public transport; therefore the lands satisfy the objective that development should extend from the town centre outwards with undeveloped lands closest to the centre and public transport routes being given preference;3. The lands are bounded to the N and E by back gardens of houses that front onto Main Street and are zoned TC; to the W by the Brewery and existing residential development zoned RE and to the S by a public road. The lands therefore satisfy the objectives of encouraging infill opportunities and better use of underutilised lands and developing lands contiguous to existing undeveloped areas;4. The lands are separated from lands zoned TC (OP3) by a small strip of lands zoned Open Space;

- the submitter sees no reason for these lands to be zoned differently from the OP3 lands;
5. These lands should be zoned TC as these lands have the advantage of having public road frontage and access to the public road;
 6. The lands comprised in AA1, AA2 and in OP1, OP2 and OP3 have a multiplicity of owners which will pose challenges in terms of short to medium term development. Access to each of these sites is limited and this will also pose a challenge. In contrast, the submitter's lands are in single ownership, adjoin public road, are linked by Poundbrook Lane to the town centre and are available for immediate development (subject to planning).

Opinion of Chief Executive

In the draft plan, the lands are zoned as follows, for the following reasons:

1. **Open Space:** These are the lands along the river and this area is proposed to be zoned 'passive open space' to protect natural biodiversity, to provide a setback of development to reduce flood risk and to provide a natural green buffer between development areas. This zone is 10m in dimension each side of the river, a setback that is required by the provisions of the County Development Plan already.
2. **R20 – New Residential:** These lands are located to the south of the watercourse and road access is only feasible from Brewery Bend. No roads access is possible from Poundbrook Lane. Therefore while the lands may have good pedestrian accessibility to the town centre, vehicles would have to take a longer circuitous route via Saville's Cross, and Brewery Bend (including three 90 degree junctions / bends) to access the site. The Brewery Bend road is not suitable for large volumes of commercial traffic, which is assumed is the desired development format, given the request to change the zoning for 'residential' to 'town centre'. For example, these lands would not be suitable for shopping which would likely generate very high volumes of vehicles. It is considered however that the lands would be suitable for residential development.

To meet the commercial and shopping needs of the town, adequate lands have been zoned for 'town centre' use in more suitable locations, such as to the west of Market Square and to the east of Main Street.

3. **RE – Existing Residential.** These are the lands immediately adjacent to an existing housing area and it is considered that RE is the optimal zoning, notwithstanding there is no residence on the lands at present. The RE zoning allows for new residential development, that respects the form and character of the residential area adjoining, which is considered necessary given the historical and heritage value of the houses nearby (as identified in the 'Conservation Area Appraisal' which forms part of the plan). These lands are not considered suitable for commercial type development that would be allowed by a TC zoning.

Overall, these lands are not therefore considered suitable for the zoning change proposed for the following reasons:

- Access, which would not be suitable for intense commercial development, and
- Protection of natural amenity and heritage.

Chief Executive's Recommendation

No change.

Name

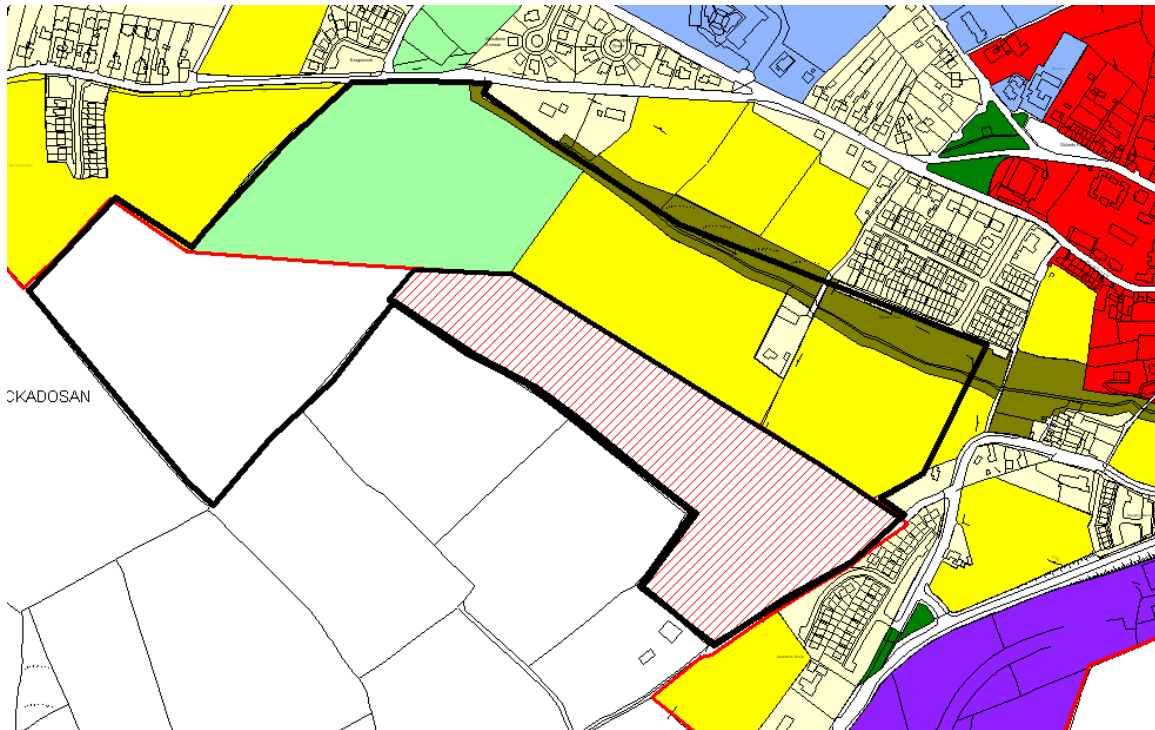
John Hobson

Submission Number

5

Summary of Issues Raised

The submitter is the owner of lands situated to the west of the town centre as shown outlined in black on the map below:



Note: This is the best approximation possible from the freehand drawn map supplied.

The submitter puts forward the following points and requests:

1. The majority of these lands were located within the boundary of the previous LAP and were previously zoned. The draft LAP proposes a change which reduces the amount of land zoned;
2. The draft LAP proposes to zone some of the lands R20 with the remainder outside of the plan boundary;
3. The proposed R20 zoning is welcomed;
4. It is requested that an additional area of c. 7ha (hatched in red above) be zoned R20 for the following reasons:
 - The zoning extension proposed would reflect the existing field boundary;
 - Given the topography of the site, it would be more appropriate to develop future housing within the entire field;
 - The site has good access to the public sewer, is well connected to the existing built up area and is the closest part of the landholding to the public road network;
 - The submitter has no objection to the AOS zoning proposed provided that the additional lands requested are zone for residential use.

Opinion of Chief Executive

The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.

It is important to note that:

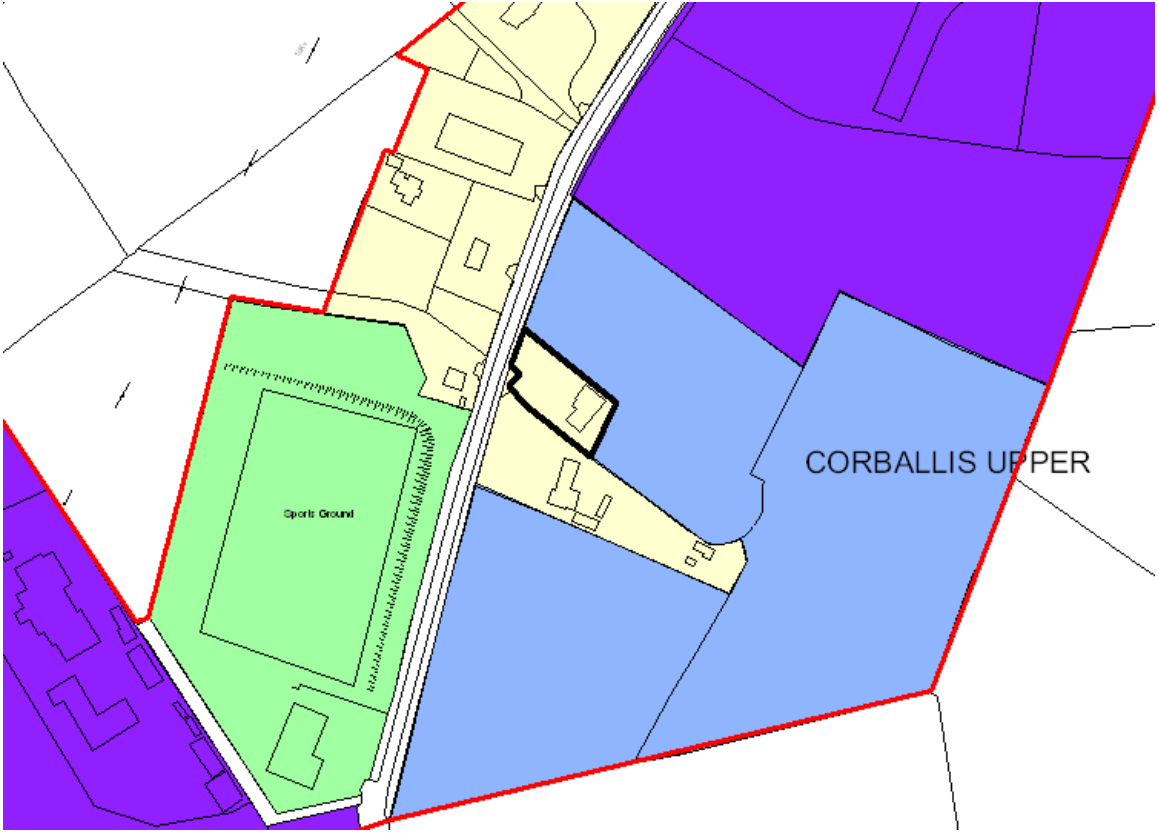
- (a) The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- (b) Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);
- (c) Enough land has been zoned in the plan to meet the target for 2023 (the lifetime of the plan) plus an additional 5 years beyond the life of the plan up to 2028 to provide for a long term planning strategy and zoning 'headroom';
- (d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development.

The rezoning of these lands from 'unzoned' to 'R20' would increase the residential development potential within the settlement and allow for the population of the settlement to extend beyond that allocated under the Regional and County population allocations and would therefore be considered not consistent with the Regional and County Strategy.

It should be noted that all of these lands were previously zoned 'CE- community, educational and institutional' for which there was apparent no demand and there was obviously an overprovision for that land use. The proposed zoning change involves a considerable gain in development potential and value and was proposed principally on the basis that development in this area would facilitate a road connection from the Greenane Road to the Avoca Road, which would improve traffic movement through the town. In the event that such a development and road infrastructure is delivered, it is possible there could be scope for additional residential zoning in this area in future plans should the need ever arise. It is considered that the amount of land zoned in this draft plan is a more than sufficient possible 'phase 1' of development in this area.

Chief Executive's Recommendation

No change

Name
Naomi Naidoo
Submission Number
6
Summary of Issues Raised
<p>The submitter is the owner of lands situated on the Avoca Road at Corballis as shown outlined in black on the map below:</p> 
<p>The submitter is requesting that the lands be zoned for residential use, given the residential use on site. It is put forward that the site has had a residence on it since 1981 and due to a recent fire, is currently uninhabitable but it is intended to rebuild. It is put forward that the site is current zoned 'CE'.</p>
Opinion of Chief Executive
<p>The site in question was zoned 'CE' in the previous plan. The draft plan proposes this zoning be changed to 'RE' to reflect the existing permitted use. It is possible that the submitter was not aware of the proposed change.</p>
Chief Executive's Recommendation
<p>No change.</p>

Name
Paul Ryan
Submission Number
7
Summary of Issues Raised
<p>The submitter outlines that he is native of Rathdrum and continues to live in the town where he is raising his young family and partly works from home. He raises the following issues:</p> <ul style="list-style-type: none"> - The plan does not address broadband infrastructure which is essential to meet the aspiration to encourage working from home; - He would like to see a statement in the plan on the provision of connectivity to the town, as well as the distribution of that connectivity around the residential and commercial areas; - In a similar vein, it is put forward that the extension of the natural gas infrastructure within the town would be of benefit to many residents.
Opinion of Chief Executive
<p>The Local Authority's strategy and objectives with regard to broadband is set out in the County Development Plan, rather than this Local Area Plan.</p> <p>It is the objective of the Council <i>'To facilitate the roll out of the National Broadband Plan and the development/expansion of communication, information and broadcasting networks, including mobile phone networks, broadband and other digital services, subject to environmental and visual amenity constraints'</i> (Objective T1, Chapter 9, Wicklow County Development Plan).</p> <p>Objectives with regard to gas network are not explicitly included in the County Development Plan; however the provision of new or enhanced utility infrastructure is generally supported by the provisions and implementation of the plan. Gas providers, along with other similar utilities, will generally provide or improve such infrastructure where a demand is identified.</p>
Chief Executive's Recommendation
No change

Name

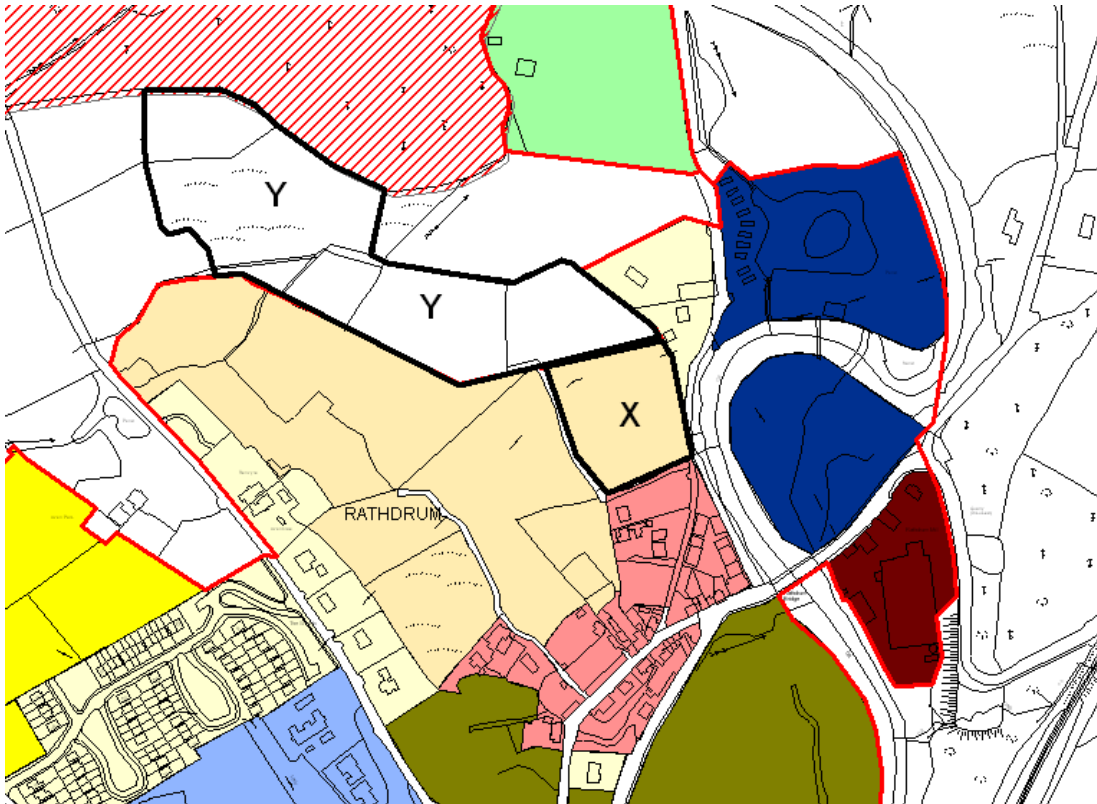
Padraig Smith

Submission Number

8

Summary of Issues Raised

The submitter is the owner of lands situated to the north of Rathdrum town centre as shown outlined in black on the map below (two parcels identified as 'X' and 'Y'):



The following amendments to the draft plan are sought:

1. The lands marked 'X', which are proposed to be zoned R10 (10/ha) should be revised to R20 (20/ha). These lands were subject of grants of permission 11/4869 and 15/889. It is put forward that the change in zoning would allow the lands to be developed in a similar fashion to that permitted under 07/900 and extended under 11/4869.
2. Include the lands marked 'Y' in the plan boundary and zone these lands R10. It is put forward that the development facilitated by such a zoning would allow for orderly development as access and connectivity of public services to these lands is available.

Additional request not related to lands above:

3. To include a heritage and landscape objective in the plan similar to that previous set out in the last plan under OHL-2 '*Discourage the stripping of render from façades to expose stonework and the removal of red granite kerbstones and red granite carved gutter channels which are unique to the town*'. It is put forward that adequate protection has not been afforded to the red kerbstones, in that many have been removed in recent footpath construction works.

Opinion of Chief Executive

1. With respect to the land marked 'X' permission was granted in 2007 for 23 houses on these lands, which would equate to a density of approx 18/ha. This permission was extended in 2011 until November 2017. The proposed change in zoning will not affect this valid permission in any way and this permission can still be invoked within the time limits allowed.
In 2015, the landowner sought a new permission on this lands for 10 houses only, equating to a density of c. 8/ha. While works have not commenced on foot of this new permission, substantial pre-development compliance proposals have been agreed to date.
Having regard to the poor access available to these lands and the sloping nature of same, at the periphery of the town, it is considered that a 10/ha density is most suitable for these lands. The only access point is at the bridge.
2. With respect to lands marked 'Y', these lands were partly zoned 'AG - agriculture' and were partly 'unzoned' in the previous plan. These zones were simply rationalised in the new draft plan and AG lands, particularly those at the periphery of the previous plan were removed, as the zoning had no real function or meaning in a 'town development plan' (Note: Where AG zoning occurred 'within' the town these zonings have been revised in the new draft plan).
3. With respect to the request to increase the development potential on the lands marked 'X' and to zone additional lands 'Y' the provision of such additional housing would be inconsistent with the Wicklow Core Strategy.

The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.

It is important to note that:

- (a) The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- (b) Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);
- (c) Enough land has been zoned in the plan to meet the target for 2023 (the lifetime of the plan) plus an additional 5 years beyond the life of the plan up to 2028 to provide for a long term planning strategy and zoning 'headroom'.
- (d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development

The rezoning of these lands from R10 to R20 and from 'unzoned' to 'R10' would increase the residential development potential within the settlement and allow for the population of the settlement population to extend beyond that allocated under the Regional and County population allocations and would therefore be considered not consistent with the Regional and County Strategy.

4. It is noted that some granite kerbstones have been removed in recent months to facilitate footpath construction. The kerbstones have been retained in order to be reinstated or reused in the town centre where feasible. The draft plan objectives, taken in conjunction with the heritage objectives set out in the County Development Plan, are considered to provide adequate

protection to those features that contribute to the special interest of the town centre and the ACA and therefore it is not considered that an additional objective specifically with respect to the kerbstones is required.

Chief Executive's Recommendation

No change

Group

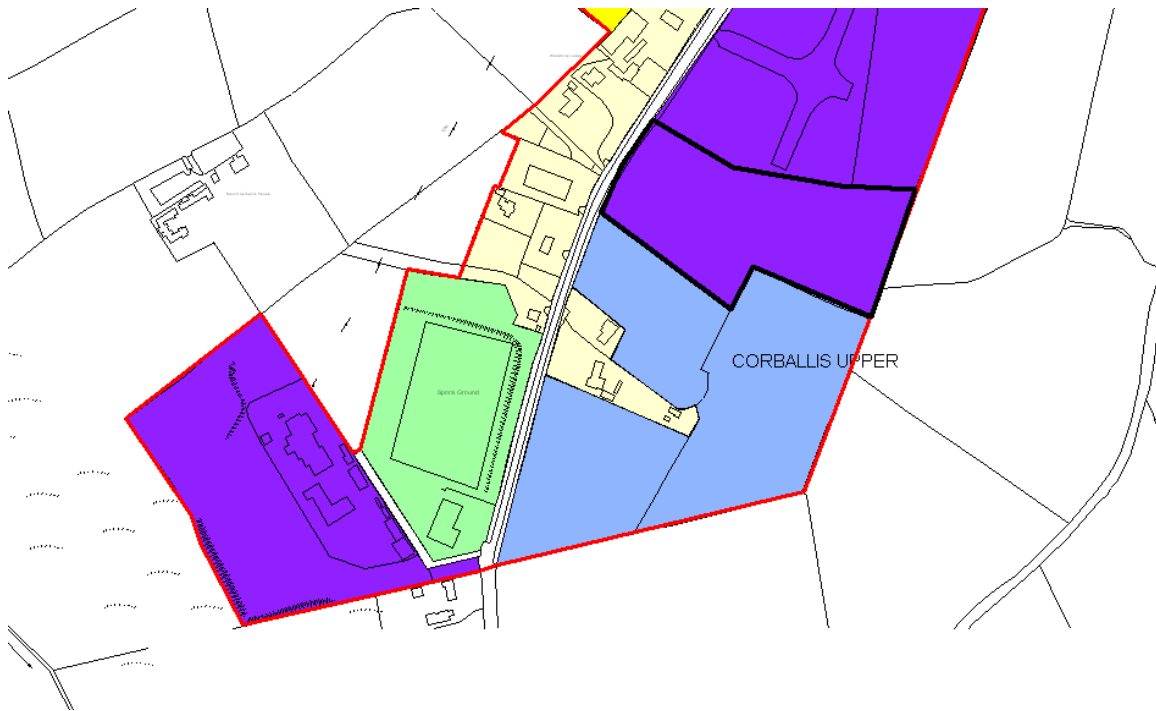
Parnell Athletics Club

Submission Number

9

Summary of Issues Raised

This submission relates to the zoning of land at Corballis. In particular, the club had previously requested that an area of land measuring 3.06ha, currently zoned for employment purposes, be rezoned for 'community' uses adjacent to an area of lands of c. 6.24ha already zoned for such use (see map below lands in question outlined in black).



It is put forward that these lands should be zoned 'CE' for the following reasons:

- The club wishes to establish a clubhouse and running track in Rathdrum;
- This land is very suitable given its topography;
- There is more than sufficient land zoned for employment in Rathdrum without the inclusion of this land;
- The provision of a sports facility on these lands would benefit the proposed increase in population;
- Much of the land already zone CE in the plan is in use for schools and the hospital; so while it appears that there is sufficient land zoned for this purpose, this land us not vacant or available;
- The lands zoned AOS in the plan are either unavailable being occupied by existing clubs or are on a steep slope and are therefore unsuitable for athletics.

It is also suggested that developers should be requested to provide community facilities as part of any proposed development.

Opinion of Chief Executive

These lands are in the ownership of Wicklow County Council and have development consent for employment use. These lands have already been serviced with roads and piped infrastructure to facilitate this use and one site has been developed. The Council is committed to the development of this employment zone and has dedicated significant resources to same. This is the only 'greenfield' employment zone in the town.

Therefore a change in zoning is not recommended.

With respect to facilities being provided by developers, this is a long standing practice of WCC, and is included in this plan through the use development criteria / requirements set out in Action Areas and Opportunity Sites.

Chief Executive's Recommendation

No change