



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Durkan Group
Reference:	DWTRLAP-164446
Submission Made	November 18, 2024 4:59 PM

Topic

Residential Development

Submission

Please refer to the attached submission made on behalf of Durkan Group.

Topic

Land Use Zoning Map

Submission

Please refer to the attached submission made on behalf of Durkan Group.

Topic

Any other issues

Submission

Please refer to the attached submission made on behalf of Durkan Group.

File

Q72324 Broomhall Rezoning v3.0.pdf, 3.91MB



THORNTON O'CONNOR
TOWN PLANNING

Submission to Wicklow County Council

In Respect of a Zoning Submission as part of the Consultation Stage of the *Draft Wicklow Town – Rathnew Local Area Plan 2025*

On Behalf of Durkan Group

November 2024

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Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Thursday, 14th November 2024

Dear Sir/Madam,

RE: SUBMISSION IN RESPECT OF THE CONSULTATION STAGE FOR THE *DRAFT WICKLOW TOWN – RATHNEW LOCAL AREA PLAN 2025*

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹ have been retained by Durkan Group² to prepare this Submission to Wicklow County Council in respect of the Consultation Stage for the *Draft Wicklow Town – Rathnew Local Area Plan 2025* (Draft LAP) in relation to a site of approximately 11.3 Ha in the settlement.

1.1 Purpose of this Submission

The purpose of this Submission is to reflect upon the detail of the Draft LAP, to comparatively assess sites within the settlement in terms of their sequential appropriateness and accessibility and to advocate for the appropriate zoning of the subject site.

Specifically, this Submission principally requests the following:

- That the entire subject site be zoned in the final version of the *Wicklow Town – Rathnew Local Area Plan 2025* as 'RN1 – New Residential', noting its excellent performance in terms of sequential appropriateness and accessibility.

The Submission also requests the following, which we contend further justify amending the zoning of the subject site:

- Increase the population and housing targets for the settlement.
- Increase the quantum of zoned RN1 lands.
- Correct an apparent double counting of RN1 sites in the Draft LAP's Table 3.1.
- Revise the wording of Objective WTR4.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14.

² First Floor, Maple House, Lower Kilmacud Road, Stillorgan, Co. Dublin.

1.2 Location of Site Subject to this Submission

The subject site, measuring approximately 11.3 Ha, is located immediately south of the residential development known as Kirvin Hill, Waverley Meadow and Waverly Drive developments. The site is greenfield in nature, but abuts existing development to the north, east and west.

Please refer to Section 3.0 below for further details of the site's location and extent.

1.3 Structure of this Submission

The Report continues with the following structure:

Section 2.0 – Executive Summary

Section 3.0 – Site Location

Section 4.0 – Core Strategy, Housing Targets, Population Growth and Residential Zonings

Section 5.0 – Audit of Land in the Context of Securing Sequential and Accessible Residential Development

Section 6.0 – Coherent and Integrated Infill Development

Section 7.0 – Intentions for Delivery

Section 8.0 – Conclusion

2.0 EXECUTIVE SUMMARY

Purpose and Requests of this Submission

This Submission principally requests the following:

- That the entire subject site be zoned in the final version of the *Wicklow Town – Rathnew Local Area Plan 2025* as 'RN1 – New Residential', noting its excellent performance in terms of sequential appropriateness and accessibility.

The Submission also requests the following, which we contend further justify amending the zoning of the subject site:

- Increase the population and housing targets for the settlement.
- Increase the quantum of zoned RN1 lands.
- Correct an apparent double counting of RN1 sites in the Draft LAP's Table 3.1.
- Revise the wording of Objective WTR4.

Subject Lands Location (Section 3.0)

The subject sites comprises undeveloped greenfield lands that are separated by small hedgerows. The lands are principally bound as follows:

- To the north by the Kirvin Hill, Waverley Meadow and Waverly Drive developments;
- To the east by undeveloped greenfield lands;
- To the south by several fields associated with agricultural uses; and
- To the west by undeveloped greenfield lands which are the subject of a live Planning Application (Reg. Ref. 24/424) for a residential development comprising 97 No. units.

To the north-east of the subject site, 2 No. Granted Planning Applications (under Reg. Refs. 21/1119 and 21/1187) are currently under construction for a combined 149 No. residential units and our being delivered by our Client.



Core Strategy, Housing Targets, Population Growth and Residential Zonings (Section 4.o)

- **Actual population growth since 2016 has been outpacing the targeted population growth** by 14%. This growth, and that identified by the ESRI and The Housing Commission (which we expect to see featured in the *First Revision to the National Planning Framework*) warrant an increase in the housing targets for the settlement and the zoning of additional RN1-zoned land by extension.
- **Insufficient RN1 lands have been zoned to deliver the housing target for the settlement given the achievable densities** would be less than the average implied by area zoned and housing target set. Therefore, additional RN1 lands will be required to deliver the housing target.
- The **Draft LAP appears to have double counted the 'Hawkstown Road' site** in its Table 3.1 as an RN1 site, whereas it is actually listed and mapped as an RN2 site. Therefore, there will be a need to zone additional, sustainably located and accessed sites as RN1.
- The wording of Objective WTR8 needs to be reconsidered due to:
 - The onerous threshold set before RN2 lands can come forward. A bar of 75% of lands requiring Planning Permission and development commencement is considerable due to the limited number of RN1 sites, high fall-off rates between consent and commencement, and the size of the Tinakilly Park site (33% of RN1 lands), which can only be unlocked once the Rathnew Inner Relief Road is designed and consent secured. We contend that the bar should be pragmatically set to 50% of RN1 lands requiring Planning Permission only.
 - In appropriate emphasis placed on not significantly breaching core strategy targets. Emphasis should, instead, be placed on prospective Applicants demonstrating that (1) hard and soft infrastructure have adequate capacity to accommodate the development and (2) ecological and environmental impacts can be ruled out.

Sequential and Accessible Residential Development (Section 5.o)

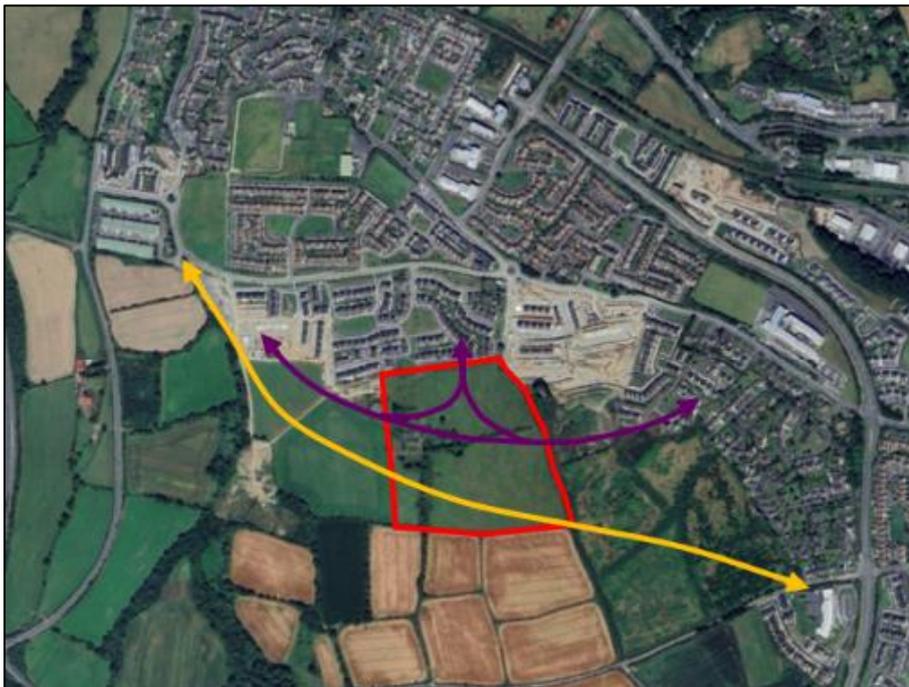
- Informed by the guidance set out in the *Guidelines for Planning Authorities – Development Plans* (2022), we have undertaken a sequential and accessibility assessment of the subject site and all other sites zoned by the Draft LAP as RN1 and RN2.
- The purpose of the assessment was to determine the most sustainable locations for future residential development.
- The assessment considered individual sites' proximity to Rathnew Village and Wicklow Town Centre and a range of key services, facilities and amenities:
 - The nearest cluster of shops & services;
 - The nearest primary school;
 - The nearest secondary school;
 - The nearest childcare facility;
 - The nearest bus stop;
 - Wicklow train station;
 - The nearest park or playground; and
 - The nearest sports facility.
- Results of the assessment revealed **the subject site as the fourth best of 25 No. sites** – i.e. it was the further closest to the above listed assets.
- The **site scored better than 7 No. sites totalling 21.5 Ha that are currently proposed to be zoned RN1**, despite being partly RN2 and unzoned in the Draft LAP. Only 2 No. RN1 sites of 1.74 Ha scored better than the subject site.
- Further analysis of the results indicated that when sites are closer to both Rathnew Village Centre and Wicklow Town Centre, they are also more likely to be closer to the above

services, facilities and amenities. Thus, they are more sustainable locations. This supports the case of prioritising development not strictly in a sequential manner outward from the urban centres, but preferably in the area between/connecting them.

- **Our observations objectively illustrate that the subject site should be zoned for residential development in the LAP ahead of other sites currently proposed for same.**

Coherent and Integrated Infill Development (Section 6.o)

- At a local level (image below), the appropriate zoning and development of the subject site can knit together the existing built environment to the north, east and west. This will allow for the delivery of housing in a practical manner, integrating with preceding development in a sequential manner. Additionally, we note our Client's intention to imminently lodged a Planning Application for residential development on the northern portion of the site.



- At a settlement level (image below), the zoning and development of the subject site would provide an opportunity to strive towards the formal amalgamation and consolidation of Wicklow Town and Rathnew.
- The town and village currently combine in a 'dumbbell' like shape; with principal nodes on either side focused around the centres of both Wicklow Town and Rathnew Village (orange circles/ovals).
- We contend that a blanket continuance of simply radiating outwards from the 2 No. centres does not reflect the scale of the combined settlement and the localised distribution of important services, facilities and amenities.
- Therefore, we are of the opinion that consideration should be given to promoting and facilitating development between the 2 No. centres, as indicated by the turquoise lines in the image below.
- The emphasis should be to the south-west – in the area of the subject site – as we are mindful of constraints to the north-east: existing and emerging development (Tinakilly Park, housing at Knockrobin and the Primary Care Centre) and flood risk (per the Draft LAP).



Intentions for Delivery (Section 7.o)

- Our Client – Durkan Group – is already active in the settlement, delivering much-needed, high-quality housing. Close to the subject site, they are nearing the completion of Hawks Bay, principally permitted under Reg. Refs. 21/1119 and 21/1187.
- This desirable development of 2- and 3-bed houses and a crèche is evidence of the quality of our Client's offering, but also their capacity and intention to deliver.
- It has been Durkan's intention that their efforts would shift south-westwards to the subject site during Q4 2024. They intend to seek Planning Permission for the northern portion of the subject site in the coming weeks based on its current residential zoning (R2) in the *Wicklow Town – Rathnew Development Plan 2013–2019*. After that, subject to securing an appropriate and necessary zoning, they would deliver the southern portion of the site as a second phase of development.
- Key water services and road infrastructure are being delivered to the boundary of the site, including 'distributor grade' road infrastructure, thus unlocking the subject site.

3.0 SITE LOCATION

3.1 Site Location and Extent

The subject site is located on the southern edge of the Wicklow Town – Rathnew settlement. It is approximately 1.3km to the south of Rathnew Village Centre and 2.2km to the north-west of Wicklow Town Centre. A northern portion of the site is within the Draft LAP’s settlement boundary for Wicklow Town – Rathnew, whilst the southern portion falls outside this. Locational context is provided in Figure 3.1.

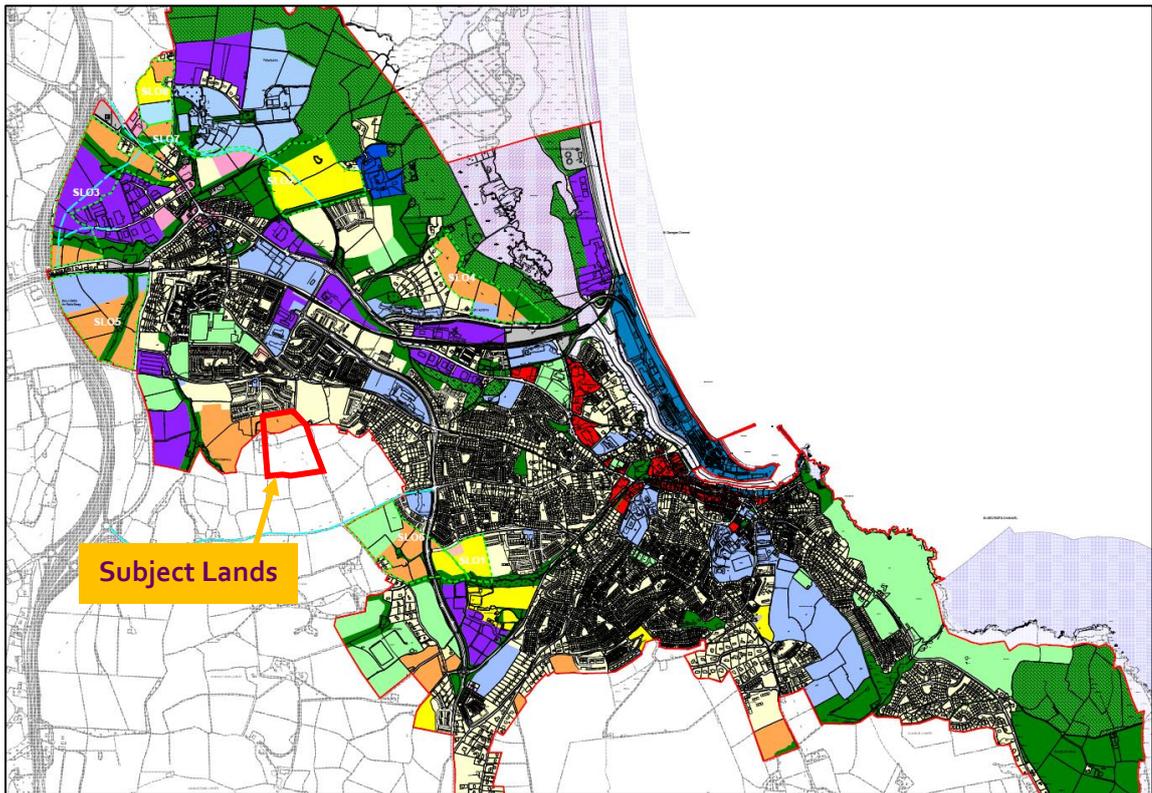


Figure 3.1: Location of the Subject Lands (Indicatively Outlined in Red)

Source: Map No. 1, Land Use Zoning Objectives, *Draft Wicklow Town – Rathnew Local Area Plan 2025*, Annotated by Thornton O’Connor Town Planning, 2024

The subject sites comprises undeveloped greenfield lands that are separated by small hedgerows. The lands are principally bound as follows:

- To the north by the Kirvin Hill, Waverley Meadow and Waverly Drive developments;
- To the east by undeveloped greenfield lands;
- To the south by several fields associated with agricultural uses; and
- To the west by undeveloped greenfield lands which are the subject of a live Planning Application (Reg. Ref. 24/424) for a residential development comprising 97 No. units.

To the north-east of the subject site, 2 No. Granted Planning Applications (under Reg. Refs. 21/1119 and 21/1187) are currently under construction for a combined 149 No. residential units.



Figure 3.2: Surrounding Context of the Subject Site (Indicative Boundary Outlined in Red)

Source: Google Earth - Imagery Date August 12/08/24, annotated by Thornton O'Connor Town Planning (2024)

As per Figure 3.3, the subject lands are located to the south/south-west of a built-up residential and mixed-use area. Broomhall, Saunders Lane, Wilton Manor, Merrymeeting, Burkeen, Sea Scape and Abbey fully are occupied estates. A further 149 No. total residential units have been permitted under Reg. Refs. 21/1119 and 21/1187 and Brookfield is currently being constructed. In fact, our Client is the Developer behind the Reg. Ref. 21/1119 and 21/1187 development. This is evidence of their active role in the settlement, their interest in delivering further housing locally and the quality of their developments. In fact, as we set out in Section 7.0 below, our Client intends to imminently lodge a Planning Application for development on the northern portion of the site.

Positively, the site is well served by a suite of vital services, facilities and amenities, which are clustered to its north-east, including:

- Childcare (e.g. Little Harvard Montessori);
- Primary School (St Coen's National School);
- Post-Primary School (Coláiste Chill Mhantáin);
- Sports Club (e.g. Rathnew AFC); and
- Local shops and services (Merrymeeting Shopping Centre).

Please see Sections 3.3 and 5.0 for further details and analysis of the above.

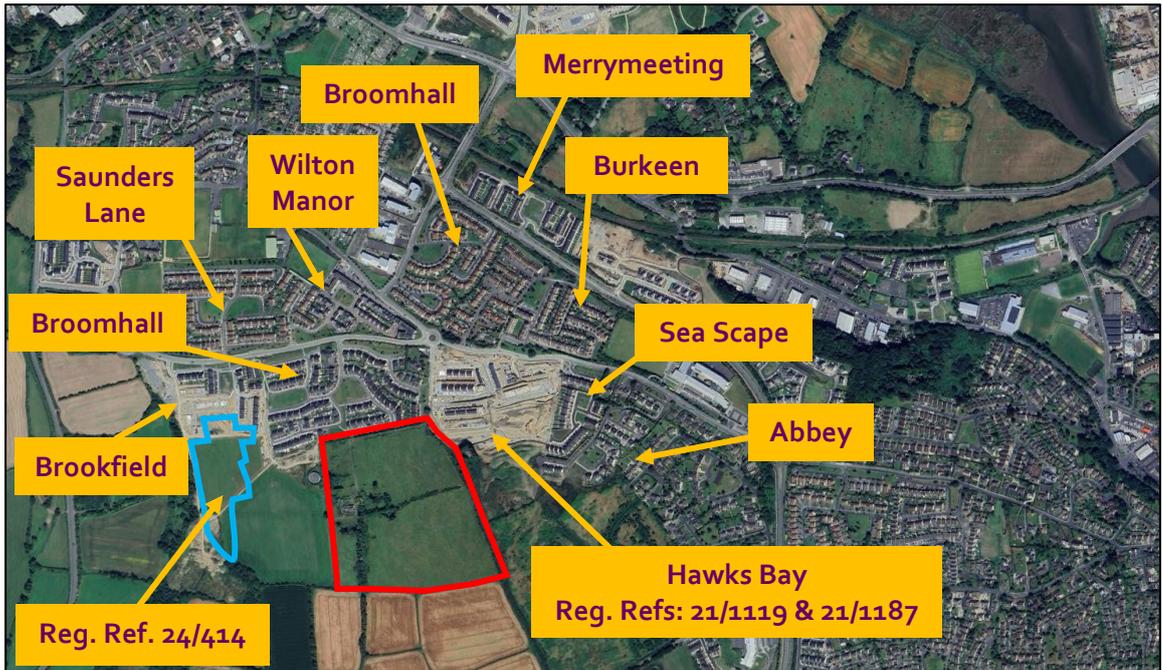


Figure 3.3: Proximate Residential Developments to the Subject Lands (Indicatively Outlined in Red)

Source: Google Earth - Imagery Date August 12/08/24, Annotated by Thornton O'Connor Town Planning, 2024

As demonstrated above, the lands are contiguous to the existing Built-Up Area (BUA) or Built Envelope of Wicklow Town – Rathnew and the zoning and development of the lands would represent a coherent infill expansion of the town given development is already present to the site’s north, east and west. The subject lands are considered an appropriate location at which to facilitate further residential development, especially with the existing road access to the site via the roundabout off Friar’s Hill.

We contend that the potential to deliver residential homes in this sustainable location has previously been recognised and accepted by the Council by virtue of the fact that the area immediately to the north, west and east of the subject site has been subject to various residential developments that are fully complete and occupied, under construction or are to begin works shortly.

Furthermore, the range of important services, facilities and amenities in this part of the settlement makes it a sustainable and desirable place in which to live; necessitating fewer and shorter car journeys and promoting greater reliance on walking and cycling.

3.2 Land-Use Zoning

3.2.1 Current Zoning: Wicklow Town – Rathnew Development Plan 2013–2019

Under the current Town Development Plan for the settlement, the subject site is comprised of 2 No. zonings (Figure 3.4). The 'phase 1' portion at the north of the site has a Residential zoning (R2) objective where "medium density, up to 28 units per ha" developments are sought. The southern 'phase 2' portion is zoned 'SLB – Strategic Land Bank', with an objective "to provide a land bank for future development of the settlement after the lifetime of this plan."

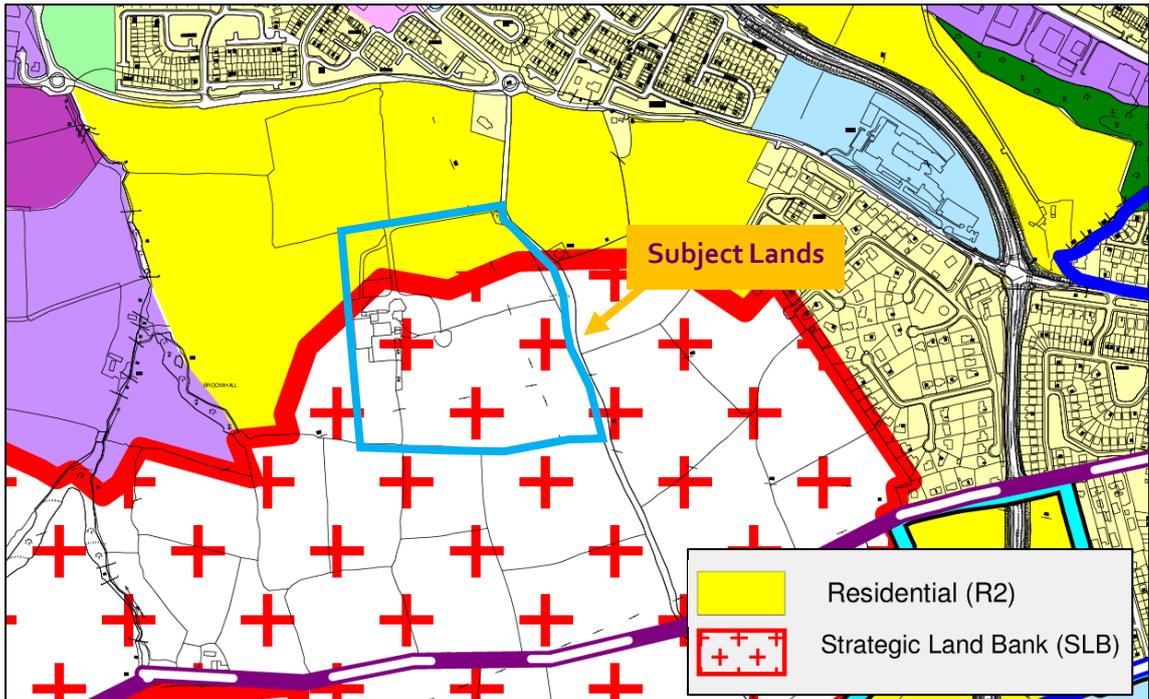


Figure 3.4: Land Use Zoning of the Subject Lands (Indicatively Labelled in Blue) Under the Expired *Wicklow Town – Rathnew Development Plan 2013-2019*

Source: *Land Use Zoning Objectives Map, Wicklow Town – Rathnew Development Plan 2013-2019, Annotated by Thornton O'Connor Town Planning, 2024*

3.2.2 Proposed Zoning: *Draft Wicklow Town – Rathnew Local Area Plan 2025*

Under the *Draft Wicklow Town - Rathnew Local Area Plan 2025*, the subject site was designated with new land-use zonings. The site remains divided into two separate zoning objectives, the northern 'phase 1' lands are proposed to be zoned 'RN2 – New Residential Priority 2', where the stated objective is to:

"To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement after the activation of Priority 1 lands."

It is currently proposed that the southern portion is de-zoned. This is illustrated in the extract from the *Draft Wicklow Town – Rathnew Local Area Plan Zoning Map*, in Figure 3.5 below.

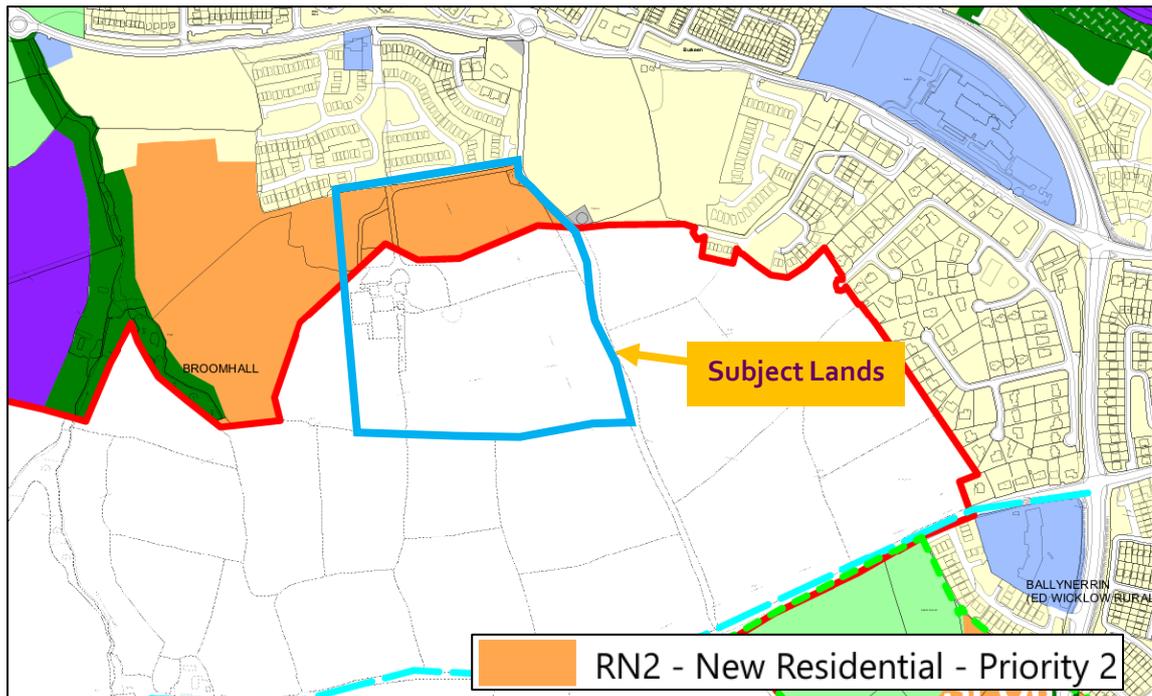


Figure 3.5: Land Use Zoning of the Subject Lands (Indicatively Outlined in Blue) Under the Draft Wicklow Town – Rathnew Development Plan 2025

Source: Land Use Zoning Objectives Map, Draft Wicklow Town – Rathnew Development Plan 2025, Annotated by Thornton O’Connor Town Planning, 2024)

3.3 Surrounding Context and Service Provision

The site is well-served by many of the basic services, facilities and amenities needed to support a new population and an expanding community. These assets are vital to meet the day-to-day requirements of people in all stages of life and the lifecycle: individuals, couples, younger and older families, and empty nesters. The subject site is also within easy reach of the established Wicklow Town Centre – approximately a 36-minute / 2.7 kilometre walk or a 6-minute / 2.8 kilometre cycle. In addition, the subject site is proximate to Rathnew Village Centre – approximately a 21-minute / 1.7 km walk or a 5-minute cycle. Within these central locations, residents could avail:

- Convenience and comparison retail;
- Personal services (e.g. hairdresser/barber);
- Professional services (e.g. solicitor);
- Childcare;
- Education;
- Healthcare;
- Place of worship;
- Community facilities; and
- Sport and recreational facilities.

However, as evidence of key amenities in the immediate environs of the subject lands, we have mapped some (but not strictly all) of these, including schools, childcare facilities, healthcare

providers³, convenience retail outlets and personal services⁴ within the environs of the site (Figure 3.6). As shown, a host of these are within 15 minutes’ walk (or a 3–8-minute cycle) of the site entrance at its interface with the recently permitted developments to the north.

Given national, regional and local policy efforts to use more active modes of transport instead of the private car, the location is within an accessible, reasonable and sustainable distance of these important assets.

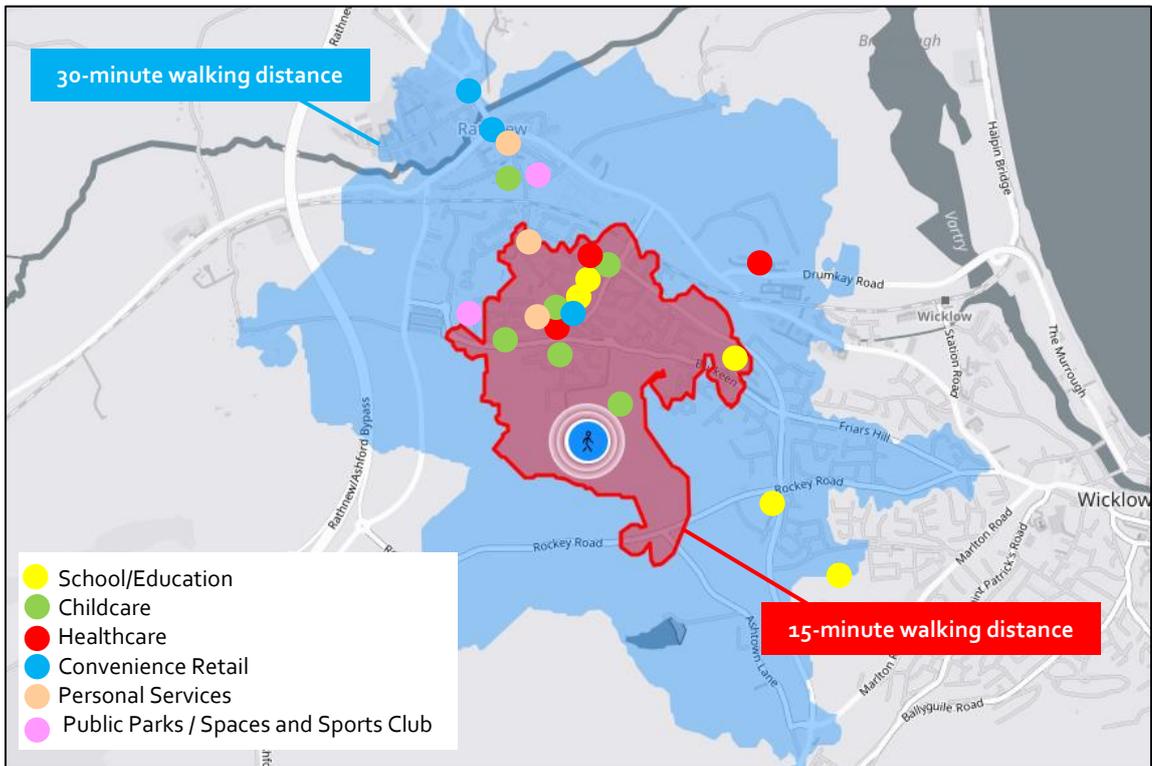


Figure 3.6: Key Services, Facilities and Amenities in a 15- & 30-minute Walking Distance of the Subject Site (Denoted by Blue Walking Icon) – Note the Childcare Facility Adjacent to the Site (Little Harvard) is set to Commence Construction as Part of the Hawks Bay Development in Q1 2025 and will Enhance the Offering Available to the Subject Site

Source: [TravelTimeMap.ie](https://www.traveltime.ie/), annotated by Thornton O'Connor Town Planning (2024)

³ Examples: medical, dental and pharmacy.

⁴ Examples: hairdresser/barber, dry cleaners, beauty, etc.

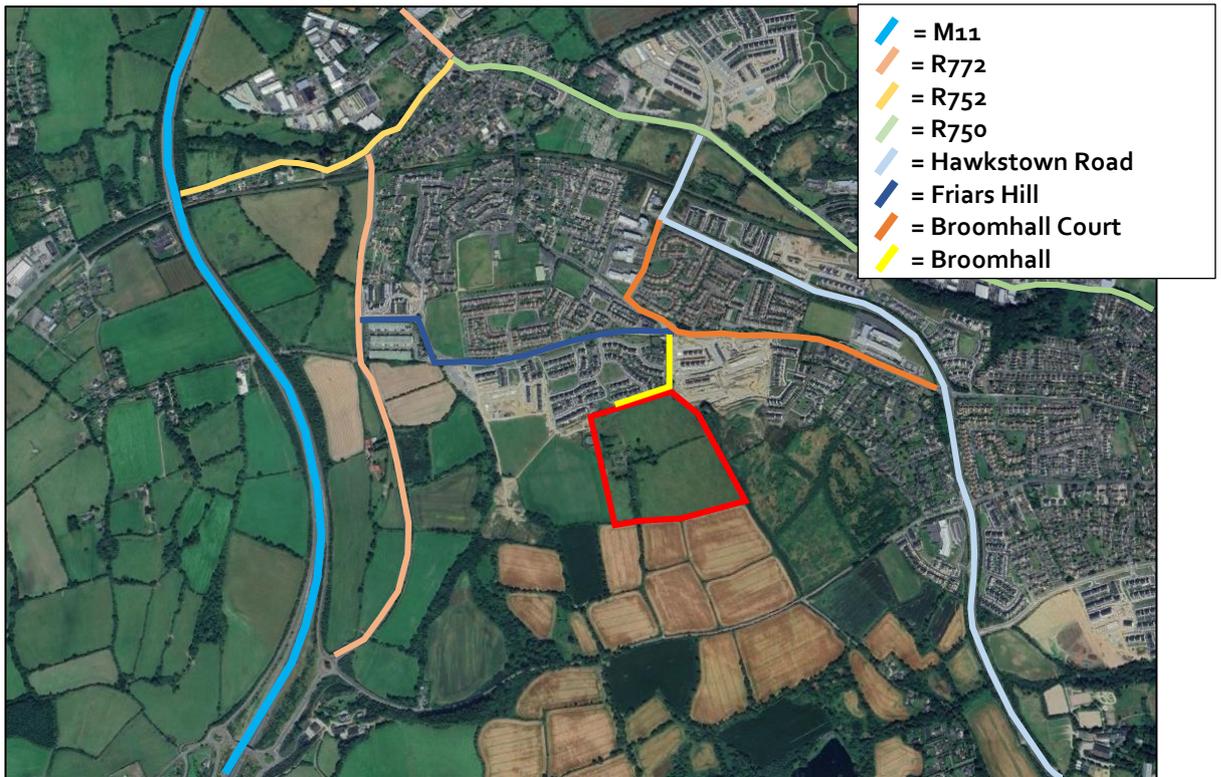


Figure 3.7: Current Accessibility of the Subject Lands (Indicative Boundary Outlined in Red)

Source: Google Earth - Imagery Date August 2024, Annotated by Thornton O'Connor Town Planning, 2024

As outlined above, the subject lands are well served by existing services, facilities and amenities that are all within reasonable distance to the subject lands. Due to the proximity of the subject lands to these services, facilities and amenities, walking and cycling to these destinations will be achievable rather than the need to use a car.

The zoning and development of the subject lands will not only provide much needed housing units in the settlement of Wicklow Town - Rathnew but will also upgrade upon the existing road infrastructure which currently provides access to the site.

4.0 CORE STRATEGY, HOUSING TARGETS, POPULATION GROWTH AND RESIDENTIAL ZONINGS

4.1 Core Strategy Analysis: Population Growth and Housing Targets

The Core Strategy of the *Wicklow County Development Plan 2022–2028*, as it pertains to the Wicklow Town – Rathnew settlement, has generally been folded into the Draft LAP. This is in the latter’s Table 2.1, which we have repurposed and expanded upon as Table 4.1 below. In the Table, we show the increase from ‘milestone to milestone’ (i.e. the change on previous). What is most notable is that while a highly progressive average household size of 1.67 No. persons per dwelling is envisaged between 2022 and Q2 2028, **this ticks back upwards to 2.35 No. persons per dwelling in the subsequent 3 years to 2031. One would expect that the average household would stabilise (if not continue to decline but at a moderated rate).**

In fact, if overall change from 2016 to 2031 is considered, the average household size of **new dwellings** would be 2.27 No. persons, which is only a slight reduction when considered against the fact that average household size of all stock by 2031 is targeted at 2.47 No. persons. Consequently, we contend that there is a basis to consider a reduction in future household sizes to (1) address historic failures to deliver housing (see increase in average household size between 2016 and 2022 and (2) to cater for ongoing societal changes which trend towards smaller households.

Date		Milestone: 2016 Census	Milestone: 2022 Census	Milestone: Q2 2028 Target	Milestone: 2031 Target
Base	Population	13,954	16,439	18,515	19,400
	Housing	5,456	6,231	7,573	7,850
	Household Size	2.56	2.64	2.48	2.47
Change on Previous Milestone	Population	-	2,485	2,076	885
	Housing	-	775	1,242	377
	Household Size	-	3.21	1.67	2.35
Change 2016–2031	Population	-	-	-	5,446
	Housing	-	-	-	2,394
	Household Size	-	-	-	2.27

Table 4.1: Population growth and targets for Wicklow Town – Rathnew, per the Draft LAP, with adaptations

Source: *Draft Wicklow Town – Rathnew Local Area Plan 2025*

However, it is emerging that the population growth and housing targets set by the Core Strategy (in Wicklow and many other Council areas) are likely to be well short of the realities that the settlement is experiencing and will continue to experience. Although not a strictly linear progression, population growth in the settlement between 2016 and 2022 was 2,485 people in total, or 414 people per annum. Yet, between 2016 and the target year of 2031, the growth in the Core Strategy as shown above is anticipated to be 5,446 people, or 363 people per annum. **Therefore, the current rate of change is 14% greater per annum than targeted. Taking a simple approach to considering a future scenario; applying a 14% overall uplift would see the 2031 ‘target’ of 19,400 increase to a 2031 ‘reality’ of 20,162 people.** In light of this, we are of the opinion that the population and housing figures are underestimates, and by extension, they require greater zoning of land in the settlement. This is not only to accommodate the

increased population of the settlement, but to bolster the case against one-off and rural housing by providing ample housing opportunities in an urban context.

The above scenario is not outlandish or unrealistic based on the findings in the ESRI's *Population projections, the flow of new households and structural housing demand* (2024) and The Housing Commission's *Report of the Housing Commission* (2024). In fact, a 14% increase would be modest relative to both of their projections. Both reports project greater population growth and highlight a need to dramatically ramp-up housing delivery. The former has been used to guide the preparation of the *Draft First Revision to the National Planning Framework* (published in July 2024, with its adoption due shortly). Whilst the original *National Planning Framework* (2017) indicated a need to deliver between 30,000 and 35,000 No. dwellings nationally per annum, this has been markedly uplifted in the Draft First Revision to "approximately 50,000" No. dwellings nationally per annum; an increase of up to 67% or 20,000 No. units nationally per annum up to at least the year 2040. **However, the Draft Revision does not include for pent-up or undelivered demand, meaning that the real housing delivery requirement is higher still.**

Bluntly applying the 67% increase to the population and housing targets of Wicklow Town – Rathnew between the years 2022 and 2031 would result in a population figure of 21,384 and a housing requirement of 8,935 No. units. **These would be significant increases on the Draft LAP's original targets of 1,984 people and 1,085 No. units that we are of the opinion should be considered without delay.**

To put this potential uplift into perspective; based on a net density of 40 dph, this would necessitate either the additional zoning or rezoning of RN2 sites equivalent to 27 Ha.

Consequently, once the First Revision to the *National Planning Framework* is formally adopted and comes into force, its housing targets will be distributed to the regions and then the Councils. Accordingly, the envisaged changes are likely to result in a substantial increase in Wicklow Town – Rathnew's population and housing targets. **Therefore, we are of the opinion that there is an opportunity in the preparation of this LAP to pre-empt these increases, avoid unnecessary delays and minimise the impacts statutory plan variations by (1) incorporating uplifts (or robust flexibility to allow for them) at this stage and (2) increasing required zoning.**

4.2 Zoning of Land per the Draft LAP

We see from Table 3.1 in the Draft LAP that 9 No. sites with a combined area of 33.3 Ha have been designated as 'RN1 – New Residential – Priority 1', with the intention being to facilitate new residential development thereon in the first instance.

Additionally, a further 11 No. sites with a total area of 47.6 Ha have been designated as 'RN2 – New Residential – Priority 2', where Planning Permission for housing may be sought once 75% of RN1 lands are activated and it can be demonstrated that the development in question "...would not result in the prevailing Core Strategy targets at the time of the application being significantly breached." In short, RN2-zoned lands are 'phase 2' and considered for medium-term development.

We set out concerns in relation to the above, as well as a potential incidence of double counting a site, in Section 4.3 below.

4.3 Key Observations and Requests in Relation to the Core Strategy and Zoning of Land in Wicklow Town – Rathnew

1. Inadequate Quantum of Zoned Residential Land to Meet Population Growth and Resulting Housing Requirement: Necessitates Increased Housing Targets and Additional Residential Zoning

We are firmly of the opinion that the above quantum of zoned residential land will be inadequate to meet the realistic population growth and housing requirements that the settlement is experiencing and will continue to experience. Therefore, as we have presented above, the Council should actively and progressively pre-empt this by zoning additional land now. **Waiting for the allocation and distribution of new population and housing targets from the NPF, through to Regional Spatial Economic Strategies and County/City Development Plans may takes months yet. Whereas the Council has the opportunity to pre-emptively zone additional land now to instigate development.**

This is especially important as this action is not just acknowledging and preparing for future population growth, but also addressing the historic pent-up housing requirement as well as the current pent-up housing requirement that is constantly being created by way of continued shortfalls of delivery; an issue raised by both the ESRI and the Housing Commission in their above-mentioned reports. **We contend that the focus should not solely be focused on future need, but also historic and continually generated pent-up requirements.**

Therefore, there is a clear need to increase housing targets and zone additional lands for residential development.

2. Inadequate Quantum of Zoned Residential Land Based on Densities: Necessitates Additional Residential Zoning

Whilst we acknowledge that there has been some housing delivery in the settlement since 2022, the housing targets and zoning of RN1 lands implies an average gross residential density of 48.6 dwellings per hectare (dph). When proposed developments on these sites are 'netted' in accordance with the methodology in Appendix B of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024), then this density will increase. Assuming a potentially conservative 'netting out' of 15% of the total area of RN1 lands would result in a net density of 57.2 dph. Although this would be a highly progressive and sustainable average density, we have reviewed the density standards in the Development Plan and the above Guidelines and **we are not of the opinion** that this average would be achieved across the various RN1-zoned sites.

The consequence would be a shortfall of RN1 zoned sites available to deliver the targeted figures as the lower developed densities would require more land to yield the same number of units.

Therefore, there is a clear and evident need to zone additional lands not only to facilitate the additional dwellings we believe are required, but simply to accommodate the basic housing target set by the Development Plan and the Draft LAP.

3. **There is a Double Counting of Identified RN₁ and RN₂ Zoned Lands in Table 3.1 of the Draft LAP: Necessitates Changes to Land-use Zoning Designations and Additional RN₁-Zoned Sites**

We have reviewed the 20 No. sites in Table 3.1 of the Draft LAP (their description, sizes and locations) and believe that there is a double counting of a site.

The site listed as 'Hawkstown Road', measuring 5.5 Ha and stated as being zoned RN₁⁵, is **actually the RN₂ zoned site (or part of it) shown on the zoning map and listed in Table 3.1 as 'Ballyneerin (Hawkstown Road, east and west)', measuring 5 Ha.** See Figure 4.1 below. We suspect there may have been overlap with the RN₁ site listed as 'Marlton (north of Marlton Stream/ Marlton Link Road)', measuring 4.6 Ha, which is entirely east of Hawkstown Road, north of Marlton Stream and south of Marlton Springs⁶.

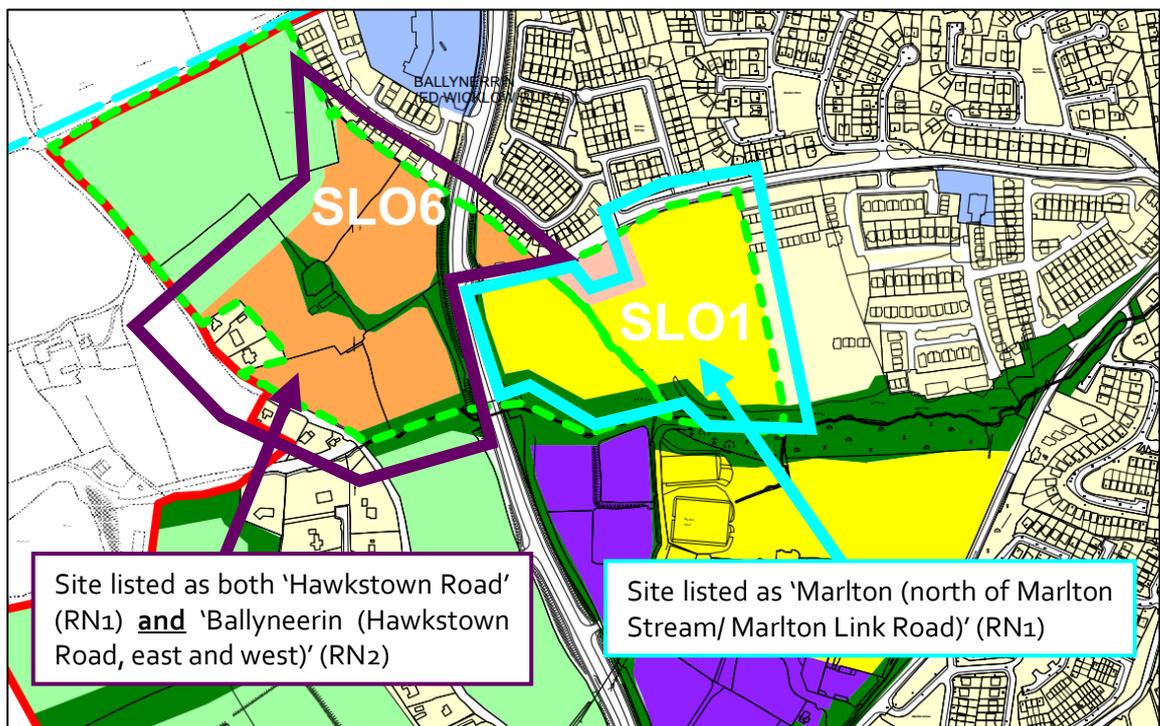


Figure 4.1: Double counted Table 3.1 site at Hawkstown Road and neighbouring site

Source: *Draft Wicklow Town – Rathnew Local Area Plan 2025*, annotated by Thornton O'Connor Town Planning (2024)

Despite the 'status' provided in Table 3.1, we do not believe that there is an extant permission of relevance on the double-counted site. Combining this fact with the site's edge of centre and non-infill location, and its moderate scoring in our assessment in Section 5.0, we are of the opinion that the site should remain as RN₂. Additionally, for clarity, the 'Hawkstown Road' entry should be removed from the Table.

In light of this vital clarification, **there is justifiable and practical merit in increasing the quantum of land zoned RN₁**. This could be done by amending the zoning of currently proposed RN₂ lands and/or by zoning new lands; **this could be easily achieved by zoning the subject as RN₁**.

⁵ Listed as Site No. 13 in our assessment in Section 5 below.

⁶ Listed as Site Nos. 11 and 12 in our assessment in Section 5 below.

In Section 5.0 below we provide an informed assessment that can guide the appropriateness and sustainability of zoning particular sites.

4. Reconsideration Required in Respect of the Threshold to Bring RN2 Lands Forward

There are serious concerns in relation to the wording of Objective WTR₄, which relates to the threshold that allows RN2 lands to be brought forward. The Objective states:

"Notwithstanding the zoning / designation of land for new residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:

- *75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached."*

With respect to the **first requirement** (75% of RN1 lands to have Planning Permission and development commenced), we are of the opinion that this is a particularly onerous threshold to ensure the steady and assured supply of housing for the settlement. The requirement for 75% of the land to have not only secured Planning Permission, but commenced development is substantial. This is due to the small number of RN1 sites identified, the size of 'Tinakilly Park' (see below) and the average rates of 'development fall-off' between securing Planning Permission and commencing construction.

Developing the above, we have concerns in relation to 11 Ha of the 33.3 Ha of total RN1 lands (33%) being assigned to just 1 No. site; specifically the site at 'Tinakilly Park'. Should, for any reason, Planning Permission and development not be realised at this single site, then there will be an absolute freeze on any RN2 lands being allowed to come forward (as it accounts for >25% of all RN1 lands). Thus, it would stall further housing delivery. Whilst the Council could facilitate a material contravention to circumvent such a scenario, this is a burden on all Parties and its very possibility is a notable risk and introduces substantial development uncertainty. It also places an undue priority and importance on the site in question. These concerns are further warranted as the 'Tinakilly Park' site is dependent on the design of, securing Planning Permission for and delivery of the Rathnew Inner Relief Road per Specific Local Objective (SLO) 2; a considerable piece of infrastructure. For clarity, the SLO 2 guidance states:

"Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the development from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road..."

In relation to the **second requirement** (that development of RN2 lands should not result in Core Strategy targets "*being significantly breached*"), we are firmly of the opinion that there is a lack of vital clarity as to what constitutes a 'significant breach'. In fact, we assert that the lack of certainty creates risks, including the creation of a possible avenue for a Third-Party to legally challenge a future Planning Application that does breach the Core Strategy targets.

The above point should also be considered in the context of the purpose Core Strategy targets, as espoused in policy. **They are a 'trajectory of travel', especially given ongoing housing**

shortages, and are fundamentally not caps or limits, as inferred by the above Objective. We have reviewed the content of the *Development Plans – Guidelines for Planning Authorities (2022)*⁷ and the *Housing Supply Target Methodology for Development Planning – Guidelines for Planning Authorities (2020)*⁸, and **cannot identify a reference in either to the “targets” being caps, limits or maxima**, or that exceeding or surpassing them should not be accommodated by a Planning Authority or An Bord Pleanála. In fact, considering a housing target as a cap or limit implies that a population target is also cap or limit, which it simply cannot realistically be.

We note that following the Council’s decision to Refuse Planning Permission for a 98-unit development in Greystones, Co. Wicklow⁹, The Irish Times published an article in which they contacted the Office of the Planning Regulator (OPR) for a response. Whilst the OPR spokesperson stated that they could not comment on the Local Authority’s decision, they remarked that:

*“...taking into account relevant national planning guidance, in a practical sense, figures [contained in development plans] are **generally regarded as broad targets rather than fixed ceilings** taking into account the extent of other uncommenced planning permissions and the likely rate of build out”. [emphasis added]*

Additionally, as recently as 17th September 2024, Tánaiste Micheál Martin remarked on RTÉ’s ‘Morning Ireland’ radio show that housing “*targets are not a ceiling.*”

Ultimately, population and housing targets are simply just: (1) a projection for the former and (2) a corresponding requirement for the latter based on an expected average household size. In reality, they generally do not reflect the capacity of infrastructure (hard, such as water services and road, and soft, such as schools and childcare) to facilitate population/housing or potential impacts on the environment. **Therefore, where infrastructure is adequate and environmental impacts can be ruled out (i.e. there are no notable ‘capacity constraints’), there is no reasonable basis upon which to inhibit the prospect of development where it is proposed on appropriately zoned and located land.**

Therefore, we request that 2 No. notable changes are made to the wording of Objective WTR4 (and any incidental sentences associated with same in the Draft LAP):

1. The **first requirement** for 75% of RN1 lands to come have Planning Permission and commenced development should be reduced to 50% and the reference to “*development initiated*” should be omitted. In short, the first requirement should be for 50% of RN1 lands to have secured *just* Planning Permission.
2. The **second requirement**, which focuses on Core Strategy population **and** housing targets, needs to be wholly reconsidered. There cannot be a cap placed on population, as this suggests limiting naturally occurring population growth within a settlement. For the housing target, we have previously indicated that it is simply a figure informed by population growth and an expected average household size, and has little basis in the infrastructural capacity of a settlement or environment to absorb it.

⁷ The Section 28 Ministerial Guidelines that provide guidance in respect of the preparation of City and County Development Plans (as well as Local Area Plans to an extent).

⁸ The Section 28 Ministerial Guidelines used to ensure “...consistent and coherent approach to be taken by planning authorities in incorporating national and regional population and housing projections into their statutory functions.”

⁹ WCC Reg. Ref. 23342 / ABP Ref. 317445.

Therefore, rather than focus on Core Strategy targets, the second requirement should be redrafted to place an onus on a prospective Applicant for development on RN2 lands to demonstrate (1) that hard and soft infrastructure have adequate capacity to accommodate the development and (2) ecological and environmental impacts can be ruled out.

5.0 AUDIT OF LAND IN THE CONTEXT OF SECURING SEQUENTIAL AND ACCESSIBLE RESIDENTIAL DEVELOPMENT

The policy framework for zoning lands is set out in the relatively recently adopted *Guidelines for Planning Authorities – Development Plans (2022) (Development Plan Guidelines)*, which applies to both Development Plans and Local Area Plans. The content of these Guidelines has informed our assessment of the subject lands in terms of their appropriateness to secure a residential zoning designation immediately.

The following Section sets out an objective approach to determine the **sequential appropriateness and accessibility** of the subject lands in accordance with the key tenets of the *Development Plan Guidelines* and best practice approaches to urban development.

5.1 Policy Basis for the Sequential Approach to Land-use Zoning and Development

The principle of the 'sequential approach' to land-use zoning and development is that more centrally located sites within existing settlements should be prioritised over more peripherally located sites. This is deemed to be a sustainable approach to planning and development that maximises the use of existing infrastructure, services and amenities, whilst supporting the densification of core areas. This is heavily espoused in the content of the *Development Plan Guidelines*, which state:

"It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently."

This accords with principles set out in other national and regional guidance. For example, the *National Planning Framework (NPF)* robustly seeks 'compact growth' (National Strategic Outcome No. 1) of settlements; effectively a development approach that seeks to drive development to within existing settlements in the first instance, then building outwards.

The NPF also sets out *A Methodology for a Tiered Approach to Land Zoning* in its Appendix 3, wherein it emphasises a preference for the delivery of Tier 1¹⁰ lands. These are serviced or easily serviced lands that are generally "...within the footprint of or **spatially sequential within the identified settlement.**" It adds that "...these lands will generally be positioned within the existing built-up footprint of a settlement or **contiguous to existing developed lands.**" Therefore, **the NPF favours sequentially favourable lands that can be "contiguous to existing developed lands" and are serviced, such as the subject lands.**

The *Development Plan Guidelines* establish 4 No. steps for the application of the 'sequential test for residential zoning in settlements':

¹⁰ As defined by the NPF, these are serviced (or easily serviced) lands: "This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development."

Step 1

Core Strategy of the Development Plan provides housing units targets based on a 'Settlement Capacity Audit', estimating housing yields/requirements for serviced (Tier 1) and serviceable (Tier 2) lands.

Step 2

Lands with potential for new residential development that are closest to settlement cores zoned to accommodate such development to fulfil the core strategy requirement.

Step 3

Where it is necessary to zone serviced (Tier 1), but spatially less central lands to meet core strategy requirements, these are to be prioritised on a spatially sequential basis (i.e. with those most proximate to the core, given preference, and first zoned for development).

Step 4

Where it is necessary to zone unserviced lands (Tier 2) in spatially less central locations, these lands should be identified and prioritised on a spatially sequential basis

For clarity, the *Development Plan Guidelines* state that the 'Settlement Capacity Audit' noted in Step 1 above:

"...accords with Appendix 3 to the NPF, which distinguishes between lands that are 'Serviced' (Tier 1) and those that are 'Serviceable' (Tier 2). This is to ensure that an informed decision can be made as to whether or not to zone land or sites in particular settlements for residential development and to inform the core strategy..."

The 'Settlement Capacity Audit' requires an *"infrastructural assessment of lands within and adjacent to settlements"* that *"at a most basic site level"* considers:

- **Road access** (including public lighting provision);
- **Footpath access** (including public lighting provision);
- **Cycle access** (including public lighting provision);
- **Foul sewerage drainage** (capacity at settlement level and access of sites to the network);
- **Water supply** (capacity at settlement level and access of sites to the network); and
- **Surface water drainage** (capacity at settlement level and access of sites to the network).

Per the Guidelines, the Settlement Capacity Audit will comprise of:

"(i) a table providing, for each settlement >1500 people, or where lands are zoned in settlements of <1,500, existing population, potential housing estimates for

(a) Tier 1 Serviced Lands

(b) Tier 2 Serviceable Lands

(ii) accompanying maps that identify Tier 1 and Tier 2 lands or sites with potential for residential development in the individual settlements, with the existing built footprint (i.e. CSO Urban Settlement boundary) also indicated."

However, in addition to considering the (1) sequential appropriateness or centrality of a site and (2) 'hard' infrastructure, the *Development Plan Guidelines* (Section 6.2.6) also require that

proximity and accessibility to other "...supporting local community and amenity services and infrastructure" is considered.

This is because simply zoning land based on its sequential order or centrality is an overly simplistic approach that fails to reflect the nuances of reality in settlements, where local and neighbourhood centres and mixed land-uses mean that town or settlement centres may not be the closest or most sustainable locations to access vital and day-to-day services and amenities.

Amongst the "...supporting local community and amenity services and infrastructure...", the Guidelines identify:

- Community facilities;
- Medical and health-care facilities;
- Schools and childcare;
- Public parks and major open spaces;
- Recreation and sports facilities; and
- Public transport.

5.2 Methodology

In short, the above policy basis for the zoning of land seeks:

- (1) To prioritise centrally located sites in a sequential manner (i.e. zoning in a radial manner from inside out);
- (2) To factor-in the 'hard' infrastructure available to delivered development on sites;
- (3) But to consider of lands' accessibility and proximity to a host of important local services, facilities and amenities.

5.2.1 'Hard Infrastructure': Tier 1 Status

With respect to Point 2 above, it is not within the scope of this Submission or the expertise of Thornton O'Connor Town Planning to carry out a full infrastructural assessment and 'Settlement Capacity Audit' (which requires inputs from multiple disciplines, including civil engineering, for example) for the entire settlement.

However, we are of the understanding that the subject site would be classified as Tier 1, as all the required services necessary (road, cycle, pedestrian and water services infrastructure) to unlock its potential are available and present for 'tie ins' at immediately abutting sites. **Therefore, the subject site is on a par with, or better served, than all other zoned residential sites within the Wicklow Town-Rathnew settlement.**

5.2.2 Sequential and Accessibility Assessment

However, with respect to Points 1 (sequential development) and 3 (services, facilities and amenities) above, we have prepared a 'comparative sequential and accessibility assessment'. This focuses on key planning, spatial and accessibility considerations, as advocated for by the *Development Plan Guidelines* in relation to the zoning of land.

The 'comparative sequential and accessibility assessment' determines the centrality of the subject lands and their accessibility to vital and day-to-day community and local services, facilities and amenities. The approach involves estimating the distance (as the crow flies) from the approximate centre of the site to each of the following existing assets¹¹:

- Wicklow town centre (approximately the Robert Halpin Monument located at the junction of Fitzwilliam Square and Main Street, as established by a Wicklow Town Centre icon on Google Maps);
- Rathnew village centre (approximately the junction of Main Street, R750 and R772);
- The nearest cluster of shops & services;
- The nearest primary school;
- The nearest secondary school;
- The nearest childcare facility;
- The nearest bus stop;
- Wicklow train station;
- The nearest park or playground; and
- The nearest sports facility.

However, as the sequential appropriateness and accessibility of sites throughout the settlement are set against each other, the assessment we have undertaken extends to include the subject lands **and** 24 No. other 'comparator' or 'competitor' sites/sub-sites (shown on Figure 5.1). Given the importance placed on the sequential approach to land-use zoning, we have focused the assessment on sites zoned 'RN1 – New Residential – Priority 1' and 'RN2 – New Residential – Priority 2', as they are considered to be most comparable and have already undergone some form of assessment by the Council in the preparation of the Draft LAP.

The above services, facilities and amenities were identified using Google searches, Google Maps and a review of the resources listed in the *Social Infrastructure Audit* accompanying the Draft LAP. The full list is included as Appendix A.

As articulated above, it is our understanding that the subject site is Tier 1 and, therefore, 'on par' with, or better served than, all other lands in the settlement from a physical infrastructure perspective¹². Thus, they should be prioritised for zoning and development.

However, as a Settlement Capacity Audit has not been prepared, we have undertaken this assessment based on the assumption that all lands are Tier 1, although we note that this is not the case in reality. This is done to simplify the assessment and we advocate for the Council to carry out their own Settlement Capacity Audit.

The location and extent of the subject site and the comparator sites are detailed on Figure 5.1 along with the locations of the identified services, facilities and amenities. The results of the assessment are detailed in Section 5.3.

¹¹ These services, facilities and amenities were identified using Google, Google Maps, the *Development Plan* and various other miscellaneous resources.

¹² Thereby negating the need for an infrastructural assessment of 'Settle Capacity Audit'.

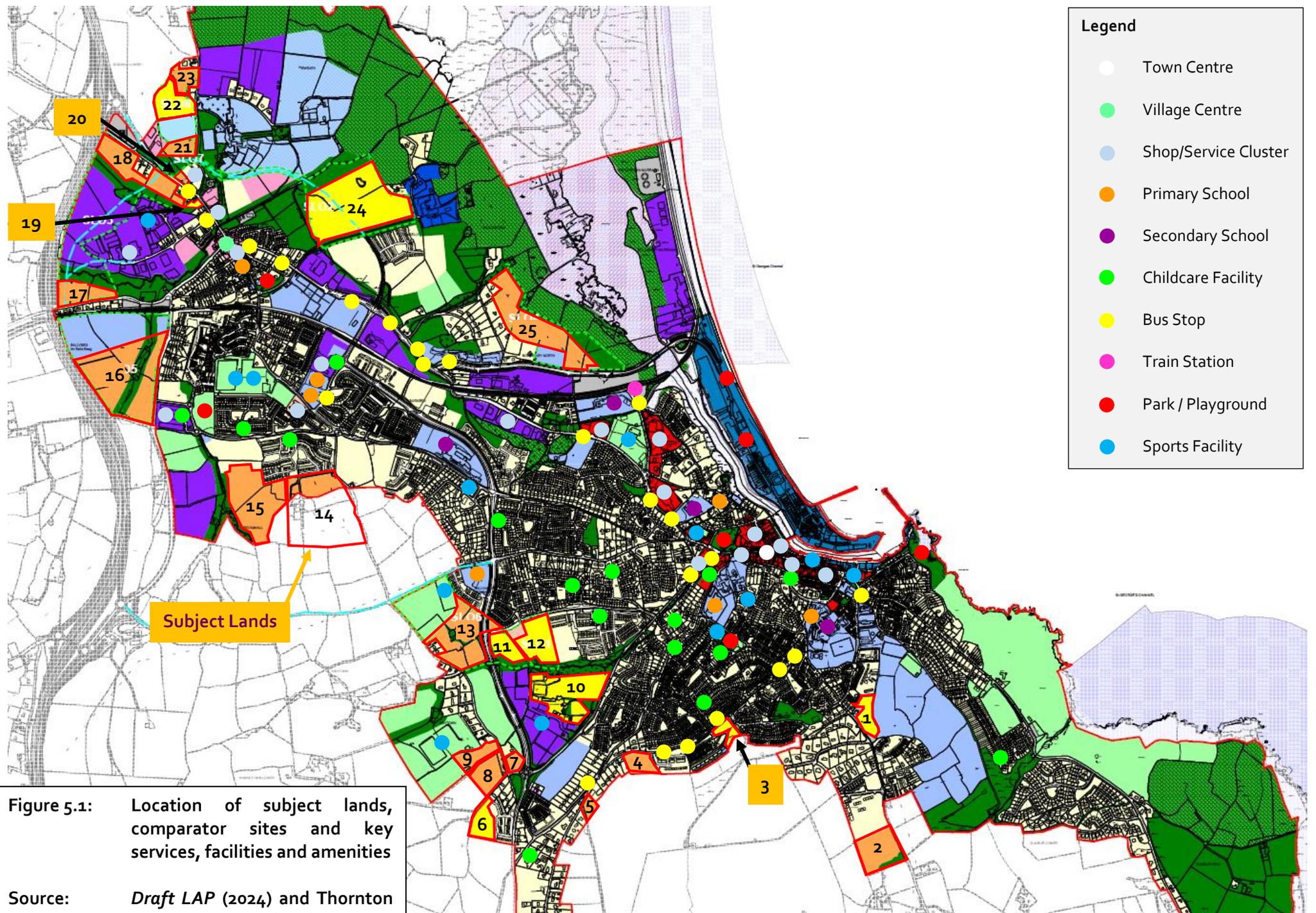


Figure 5.1: Location of subject lands, comparator sites and key services, facilities and amenities

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

5.3 Assessing the Sequential Appropriateness and Accessibility of the Subject Site and Comparator Sites

5.3.1 Overall Findings of the Assessment

The findings of the assessment are set out in Table 5.3 below. As is evident, **the subject site scores very well, yielding a combined distance of 9,691 metres, resulting in a rank of 4th out of the 25 No. assessed sites.** This is despite the site being mostly unzoned, with only a portion benefitting from what is effectively a phase 2 residential zoning.

The 21 No. sites that score worse than the subject site have combined distances that are between 9,693 and 16,101 metres, or between 0.02% and 66.1% farther. Clearly, some are markedly more distant from the key services and amenities the *Development Plan Guidelines* advocates for close proximity to.

In fact, when we combine the areas of the 21 No. sites that score worse than the subject site, we note they come to 65.32 Ha (based on approximation made using Google Earth). Yet at approximately 11.3 Ha, the subject site constitutes a substantial landbank and opportunity when compared with the smaller and often less efficiently and effectively delivered smaller sites.

5.3.2 Phasing and Prioritisation of Lands in a Sustainable Manner

Analysis of the assessment’s findings is also revealing in relation to the broader sequential appropriateness and accessibility of the sites zoned for residential uses by the Council. As we show in Table 5.1, only 2 No. sites with an area of 1.74 Ha are zoned RN1 and have shorter combined distances (i.e. perform better) than the subject site. Yet, 21.5 Ha across 7 No. sites also zoned RN1 have greater combined distances (i.e. perform worse) than the subject site. Interestingly, we note 1 No. site of 7.29 Ha (No. 25) zoned RN2 that performed better than all other sites (despite its ‘phase 2’ designation).

Zoning	Shorter Combined Distance	Number of Sites	Greater Combined Distance	Number of Sites
RN1	1.74 Ha	2	21.50 Ha	7
RN2	7.29 Ha	1	43.82 Ha	14
Total	9.03 Ha	3	65.32 Ha	21

Table 5.1: Area of lands zoned RN1 and RN2 in the Draft LAP based on having a shorter or greater combined distance than the subject site

Source: Thornton O’Connor Town Planning (2024)

The above observations indicate that the phasing and prioritisation of lands do not appear to align with a broader, more holistic approach to sustainable zoning, which is sought by the *Development Plan Guidelines*. We are firmly of the opinion that this, therefore, requires a reconsideration of residential zoning in the settlement.

It reads as contrary to logic and planning policy for certain sites to be ‘deprioritised’ with an RN2 zoning or wholly omitted from delivering housing despite being more sustainable locations for same.

5.3.3 Planning Applications for Development on Poorer Performing Sites

In addition to the main assessment, we also looked at the planning and development status of the various sites. We identified that 6 No. of the sites are subject to an active Planning Application, are awaiting a planning decision or are currently under development (Table 5.2).

Site No.	Area (Ha)	Assessment Rank	Planning Reg. Ref.	Status	No. Units
14 – Subject Site	11.3	4	–	–	–
2	3.72	25	23914	Decision Pending	56
6	1.78	23	24311	Decision Pending	54
10	0.97	3	24179	Decision Pending	65
12	2.89	5	201296	Commenced	92
15	7.43	7	24414	Decision Pending	97
22	2.45	22	23854	Commenced	80

Table 5.2: Planning and development status of those sites with some level of ‘activity’ (i.e. excludes sites with no identified activity) and the subject site for comparison

Source: Wicklow County Council (2024), Building Control Management System (2024) and Thornton O’Connor Town Planning (2024)

As is clear, only 1 No. of the sites where planning and development activity is live performed better than the subject site; Site No. 10, which is currently awaiting a planning decision. By contrast, there are 5 No. sites where either development has commenced or a planning decision is awaited that performed worse than the subject site.

These findings indicate the pursuit of development in what we have identified as less sustainable and accessible locations when considered in the context of our assessment. Should development indeed be delivered on the latter 5 No. sites, it further bolsters the need to identify lands such as the subject site for zoning, by redirecting housing construction to better served and connected areas.

5.3.4 Patterns of Development and Accessibility to Key Services, Facilities and Amenities

The best overall scoring sites (25, 3 and 10) have proven to **not** be those that are closest to Rathnew Village and Wicklow Town Centres, suggesting that proximity to the urban centres is not the leading requirement for sustainable siting and delivery of development. However, further analysis of the findings reveals that:

- There is a very limited positive correlation (+0.1) between distances to whichever of Wicklow Town Centre or Rathnew Village Centre is closest and combined distances to the various services identified.
- There is effectively no correlation (-0.01) between site distances to whichever of Wicklow Town Centre or Rathnew Village Centre is closest and the overall distance of the assessment.

The above observations are slightly at odds with the medium and medium-to-strong correlations identified between combined distances to Wicklow Town Centre and Rathnew Village Centre and both combined distance to the various services identified (+0.54) and overall distance (+0.75).

We contend that the above findings suggests the accessibility of sites to key services and facilities is of greater importance than a site's proximity to an urban centre (i.e. a strict application of the sequential approach). **However, the above does imply that being close to both Rathnew Village Centre and Wicklow Town Centre means a site is also more likely to be close to key services.** This point is vital to be aware of and bolsters our recommendation in Section 6.0 below that the 'connection' or link between the 2 No. nodes of the Village and Town Centres should be prioritised for development. In fact, 5 No. of the top 10 No. scoring sites are either partly or wholly within the turquoise link area shown on Figure 6.1 below.

Amenity/Facility	1	2	3	4	5	6	7	8	9	10	11	12	13	Subject Site 14	15	16	17	18	19	20	21	22	23	24	25
Town Centre (Wicklow)	952	1550	894	1210	1510	1920	1610	1750	1740	1130	1360	1200	1570	2210	2510	3260	3540	3610	3280	3410	3490	3650	3660	2690	1570
Village Centre (Rathnew)	3910	4360	3420	3250	3260	3110	2900	2900	2800	2770	2420	2470	2240	1370	1320	852	702	563	249	392	506	727	812	628	1580
Shops/Services cluster	744	1380	822	1060	1340	1720	1400	1540	1520	915	1130	968	1330	508	553	281	267	211	67	205	135	209	343	626	487
Primary School	584	1200	663	245	75	572	423	533	602	509	370	415	297	535	621	922	1200	1360	1070	1220	1330	1550	1620	924	1220
Secondary School	522	1140	694	1120	1430	1840	1530	1610	1520	1040	1160	1010	930	682	976	1610	1890	2030	1710	1860	1950	2150	2200	1310	532
Childcare Facility	705	761	147	251	83	243	326	335	443	367	400	333	324	355	390	767	767	791	493	644	759	980	1060	652	998
Bus Stop	454	992	45	156	108	580	408	526	589	417	775	742	965	585	701	1000	681	262	67	53	183	413	521	446	481
Train Station	1990	2560	1730	1830	2030	2240	1910	2010	1950	1470	1410	1310	1480	1630	1930	2480	2670	2650	2320	2440	2500	2640	2640	1670	545
Park/Playground	780	1250	436	743	1050	1500	1210	1360	1360	767	1090	937	1320	1110	550	414	838	834	522	672	780	994	1070	589	945
Sports Facility	331	908	452	524	525	455	357	279	179	163	333	308	224	706	654	573	425	237	249	285	400	607	729	990	678
Combined Distance	10972	16101	9303	10389	11411	14180	12074	12843	12703	9548	10448	9693	10680	9691	10205	12159	12980	12548	10027	11181	12033	13920	14655	10525	9036
Rank	12	25	2	8	14	23	16	20	19	3	9	5	11	4	7	17	21	18	6	13	15	22	24	10	1
Site Area (Ha approx.)	1.47	3.72	0.77	1.16	0.63	1.78	0.65	1.82	1.12	0.97	1.88	2.89	5.18	11.3	7.43	11.3	2.88	5.75	0.33	0.3	0.89	2.45	0.99	10.7	7.29
Zoning	RN1	RN2	RN1	RN2	RN2	RN1	RN2	RN2	RN2	RN1	RN1	RN1	R2	RN2/UZ	RN2	RN2	RN2	RN2	RN1	RN2	RN2	RN1	RN2	RN1	RN2
Reg. Ref.	N/A	23914	N/A	N/A	N/A	24311	N/A	N/A	N/A	24176	N/A	201296	N/A	N/A	24414	N/A	N/A	N/A	N/A	N/A	N/A	23854	N/A	N/A	N/A
No. Units	-	56	-	-	-	54	-	-	-	65	-	92	-	-	97	-	-	-	-	-	-	80	-	-	-
BCMS Commencement	-	No	-	-	-	No	-	-	-	-	-	CN011 4391 WW	-	-	-	-	-	-	-	-	-	CN012 0966 WW	-	-	-
Status	-	Pending Decision	-	-	-	Decision Pending	-	-	-	Pending Decision	-	Commenced	-	-	Decision Pending	-	-	-	-	-	-	Commenced	-	-	-
Legend																									
	Site with Planning Permission decision pending that has a lower combined distance than the subject lands (i.e. performs better).																								
	Sites with Planning Decision pending or construction commenced that have a greater combined distance than the subject lands (i.e. perform worse).																								

Table 5.3: Results of the sequential and accessibility comparative assessment

Source: Thornton O'Connor Town Planning (2024)

5.4 Concluding Remarks on the Comparative Sequential and Accessibility Assessment

Based on the findings of the assessment, we contend that there is a robust case to be made for supporting the zoning and development of the subject site ahead of many of the settlement's existing sites.

Overall, it ranked 4th, placing it ahead of 21 No. other sites. Amongst, these were 7 No. RN1 sites which have an area of 21.5 Ha. Despite being objectively less sustainable sites based on our assessment, their zonings would seem them prioritised ahead of the subject site.

Therefore, we are of the position that there is an onus on the Council to reconsider its zoning of residential lands in the settlement; and as part of this, to zone the entire subject site as RN1. This comes on the back of the key observations and requests we made in Section 4.3 above.

Based on the above, it is our opinion that failing to zone the subject site would be contrary to:

- Best practice;
 - Planning policy at national, regional and local levels; and
 - The principles of proper and sustainable planning and development.
-

6.0 COHERENT AND INTEGRATED INFILL DEVELOPMENT

We note that planning policy at national and local levels advocates for infill and integrated development. For example, in the NPF, Section 2.6 ('Securing Compact and Sustainable Growth') states that "...a preferred approach would be compact development that focuses on reusing previously developed, 'brownfield' land, **building up infill sites, which may not have been built on before** and either reusing or redeveloping existing sites and buildings." **[emphasis added]**

Elsewhere, the NPF includes National Policy Objective 35, which emphasises the importance of infill development:

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

These intentions manifest themselves as:

- National Strategic Outcome 1 (Compact Growth), which explicitly references infill development; and
- National Policy Objectives 3a, 3b and 3, which seek to prioritise development within existing settlements.

At a local level, we note the following key provision, which are also prioritises infill and integrated development:

- SCO1 ('Sustainable Settlement Patterns & Compact Growth') – *"The delivery of compact growth in all towns and villages **by capitalising on the potential for infill** and brownfield development, moving away from a reliance on greenfield development and creating places that encourage active lifestyles is essential for the successful delivery of the development plan strategy."* **[emphasis added]**

It is in the context of the above, and the existing and currently emerging pattern of development in Wicklow-Rathnew, that we contend that there is an opportunity to achieve sustain able infill development at the subject site. This is both at a local/micro level (Figure 6.1) and at a settlement/macro level (6.2).

At a local level, it is evident in Figure 6.1 that the appropriate zoning and development of the subject site can knit together the existing built environment to the north, east and west. The purple arrows show the infill nature of the site, which is bound by existing or under construction development on 3 No. sides. This will allow for the delivery of housing in a practical manner, integrating with preceding development in a sequential manner. Additionally, we note our Client's intention to imminently lodged a Planning Application for residential development on the northern portion of the site.

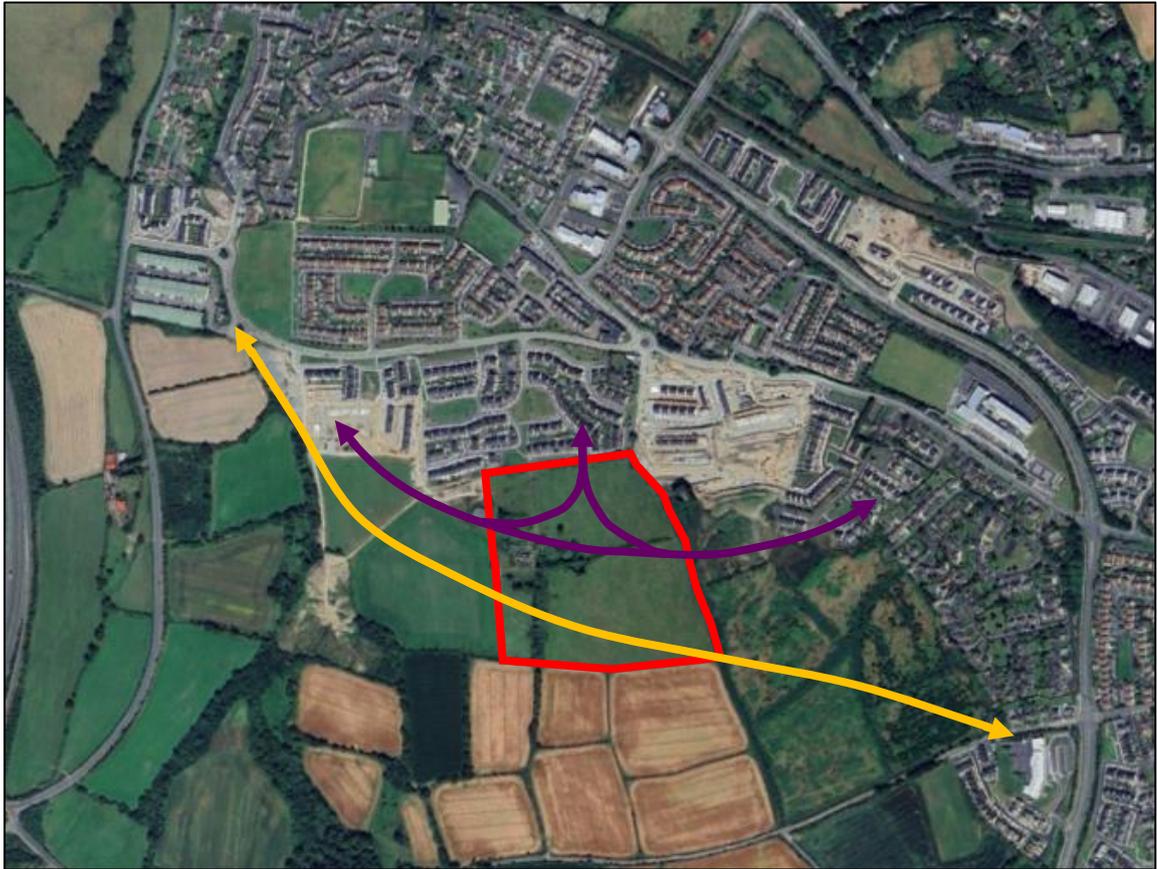


Figure 6.1: Opportunity to deliver integrated, infill development

Source: Google Earth (image from 12/8/2024), annotated by Thornton O'Connor Town Planning (2024)

At a settlement level, the zoning and development of the subject site would provide an opportunity to strive towards the formal amalgamation and consolidation of Wicklow Town and Rathnew. As is evident in Figure 6.2 below, the town and village combine in a 'dumbbell' like shape; with principal nodes on either side focused around the centres of both Wicklow Town and Rathnew Village (orange circles/ovals).

Consequently, the 'separate' urban centres have grown and evolved in a somewhat disconnected spatial manner, linked by a narrower strip in the middle (purple outline in Figure 6.2). Whilst these patterns may be considered as being sequential or radial (as advocated for in planning policy), we contend that a blanket continuance of this approach does not reflect the scale of the combined settlement and the localised distribution of important services, facilities and amenities (as identified in Section 5.0 above).

Accordingly, we are of the opinion that consideration should be given to promoting and facilitating development between the 2 No. nodes, as indicated by the turquoise lines in Figure 6.2. In fact, this already appears to be an emerging pattern, as evidenced by the development of Tinakilly Park to the immediate east of Rathnew Village.

However, we are of the stance that emphasis to the south-west – in the area of the subject site – should be prioritised as we are mindful of constraints to the north-east: existing and emerging development (Tinakilly Park, housing at Knockrobin and the Primary Care Centre) and flood risk (per the Draft LAP).

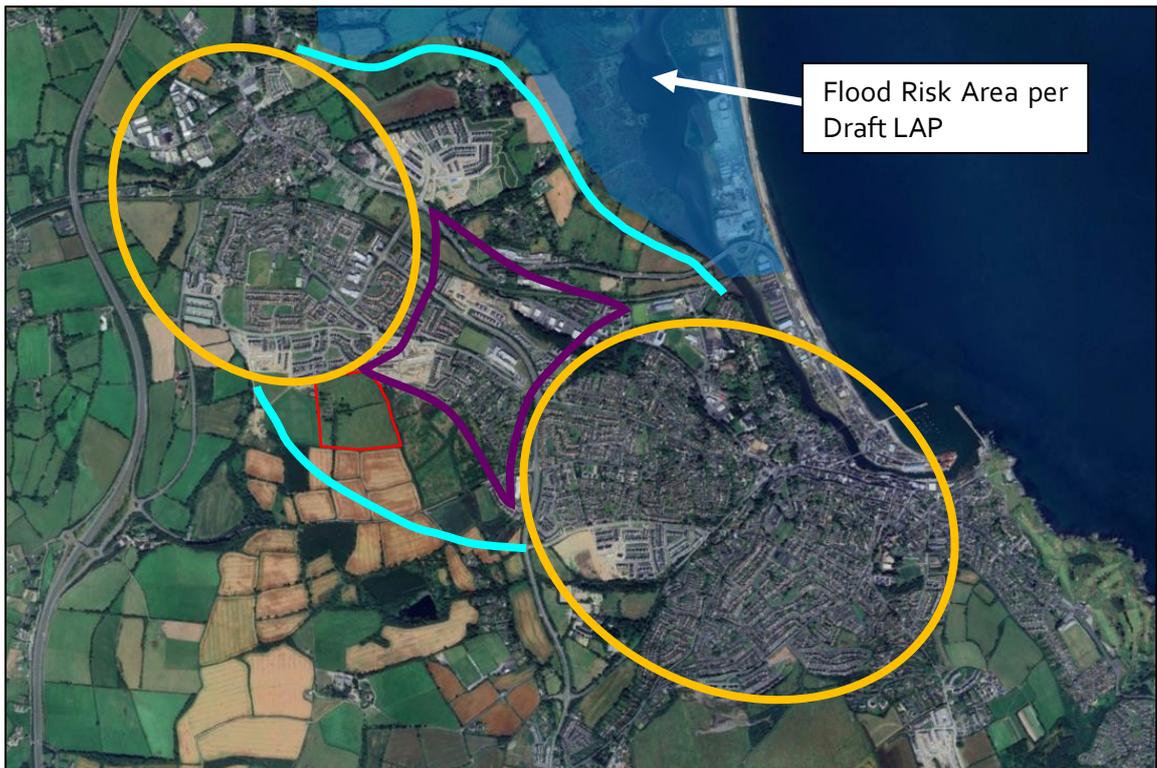


Figure 6.2: Opportunity to deliver integrated development that will consolidate and connect the existing nodal patterns of development around Rathnew Village and Wicklow Town

Source: Google Earth (image from 12/8/2024), annotated by Thornton O’Connor Town Planning (2024)

To add to the above qualitative observations, we direct the Council back to our analysis in Section 5.3.4 above. **This demonstrated that sites that are closer to both urban centres are likely to be closer to various services, facilities and amenities; thus, they are better connected and more sustainable locations for residential development. The subject site proves to be a prime example of this.**

Thus, ‘filling in the gap’ or enhancing the connection between Rathnew Village and Wicklow Town has the possibility of facilitating more sustainable development outcomes.

7.0 INTENTIONS FOR DELIVERY

7.1 Intention to Deliver

As mentioned above, our Client – Durkan Group – is already active in the settlement, delivering much-needed, high-quality housing. Close to the subject site, they are nearing the completion of Hawks Bay, principally permitted under Reg. Refs. 21/1119 and 21/1187. This desirable development of 149 No. 2- and 3-bed houses and crèche is evidence of the quality of our Client’s offering, but also their capacity and intention to deliver.

Images of Hawks Bay are presented in Figures 7.1 and 7.2 below, and provide an indication of the attractiveness of prospective development at the subject site.



Figure 7.1: Image of the Client’s Hawks Bay residential development to the immediate north-east of the subject site

Source: Durkan Group (2024)



Figure 7.2: Image of the Client's Hawks Bay residential development to the immediate north-east of the subject site

Source: Durkan Group (2024)

It has been Durkan's intention that their efforts would shift south-westwards to the subject site during Q4 2024. They intend to seek Planning Permission for the northern portion of the subject site in the coming weeks based on its current residential zoning (R2) in the *Wicklow Town – Rathnew Development Plan 2013–2019*. After that, subject to securing an appropriate and necessary zoning, they would deliver the southern portion of the site as a second phase of development.

The ability to proceed in this manner is aided by the subject site's abuttal of the Hawks Bay development (Figure 7.3), which has delivered water services and road infrastructure up to its boundary. Hence, the Tier 1 infrastructure designation of the subject site noted in Section 5.0 (above). Of particular note is the delivery of the 'distributor grade' road through the Hawks Bay development that has been intentionally designed and included in order to cater for the future development of the subject site (Figures 7.4 and 7.5). Thus, the site is not isolated or deprived of services; rather, it can quickly and easily tie into existing infrastructure.



Figure 7.3: Image showing the immediate adjacency of the subject site relative to the Hawks Bay development

Source: Durkan Group (2024)

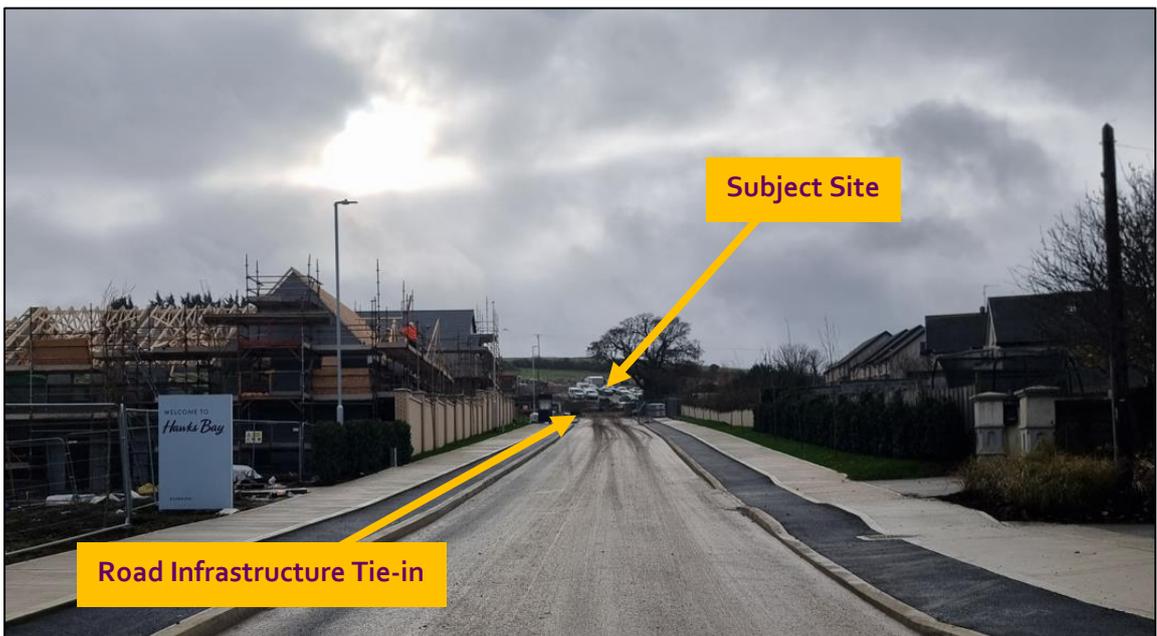


Figure 7.4: Image showing Hawks Bay road infrastructure (including footpaths and cycle paths) tying into the subject site

Source: Durkan Group (2024)

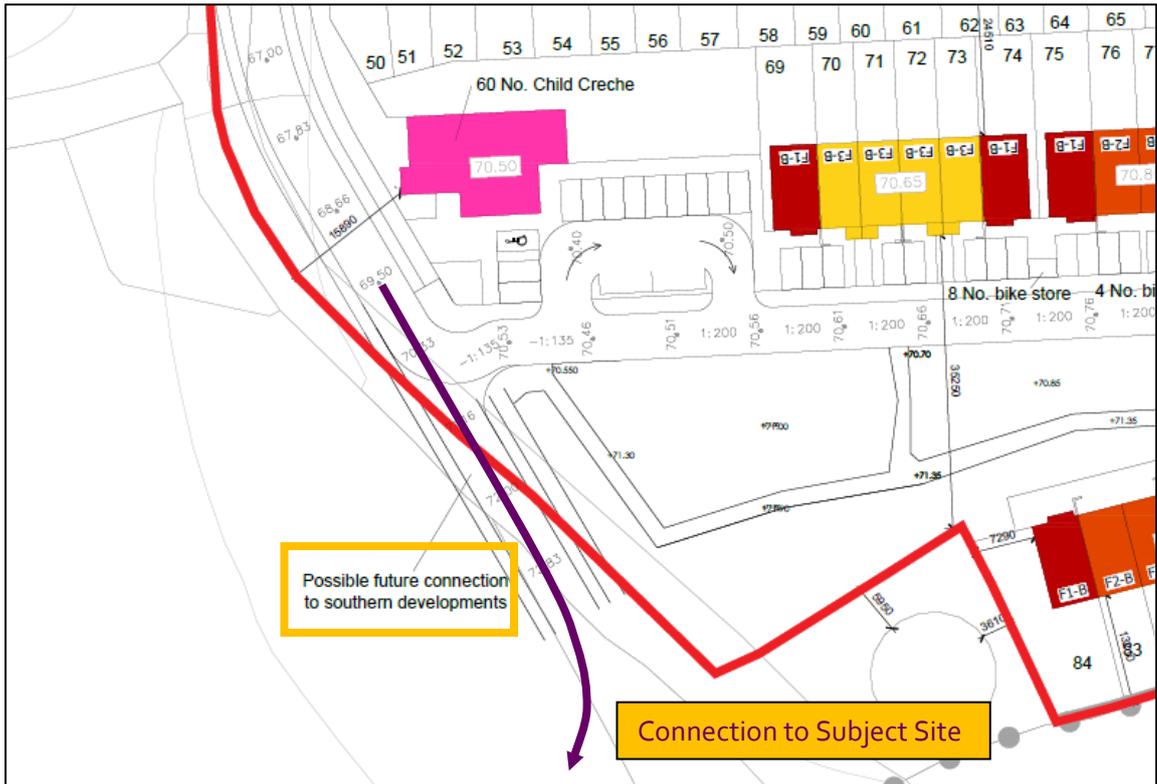


Figure 7.5: Extract from the Hawks Bay Site Plan illustrating the development's connection to the subject site

Source: bba architecture (2023), annotated by Thornton O'Connor Town Planning (2024)

7.2 Timeline for Delivery

Delivery of housing at the subject site is subject to securing and retaining the necessary zoning designations and Planning Permissions.

In the first instance, assuming Planning Permission for the northern portion of the site is secured by Q2 2025, it is envisaged that construction would commence by Q1 2026 with completion within approximately 18 months.

The southern portion of the site, which the Draft LAP effectively proposes to dezone, would represent the second phase of development. Subject to securing the RN1 zoning on-site, Planning Permission would be lodged by Q4 2025, with the expectation that development would commence in Q3 2026 and be completed by Q3 2028.

8.0 CONCLUSION

This Submission to the Draft LAP has requested a series of changes to its content, including the zoning of the subject site as RN1 to facilitate the immediate development of housing.

The Submission also set out why the settlement's population and housing targets should be revised upwards, and for a multitude of reasons, additional lands need to be zoned RN1. Additionally, we set out a strong case for the redrafting of Objective WTR₄, which sets a high bar for the release of RN2-zoned lands and creates a potential blockage by zoning a single site with an area of 11 Ha (>25% of all RN1-zoned lands).

The bases for zoning the subject site as RN1 are informed by its excellent score in our assessment of sites' sequential appropriateness and accessibility to key services, facilities and amenities – ranking fourth out of 25 No. sites. In fact, the subject site performed better than 7 No. RN1-zoned sites that we identified, which have a total area of 21.5 Ha.

Importantly from the Council's perspective, the request to rezone the subject site is not speculative in nature, but is sought to facilitate our Client's genuine intention to promptly develop housing at the site (first half of the LAP's life).

We trust the above insights have proven beneficial and hope that the Council actively amends the relevant aspects of the Draft LAP as has been respectfully requested.

Should you require any further insights, please do not hesitate to contact the undersigned.

Yours faithfully,



Patricia Thornton
Director
Thornton O'Connor Town Planning

