



Wicklow Town - Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Virtus Project Management (on behalf of Pathway Homes)
Email Address:	[REDACTED]
Reference:	WRLAP-153602
Submission Made	September 28, 2023 3:37 PM

File

Submission Wicklow-Rathnew LAP Issues Stage _Pathway Homes Submission_.pdf,
0.65MB

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



'Wicklow Town – Rathnew LAP',
Administrative Officer, Planning Department,
Wicklow County Council,
County Buildings, Station Road,
Wicklow Town,
A67 FW96

(Submitted through Online Consultation Portal)

Date: 28th September 2023

**RE: SUBMISSION ON BEHALF OF PATHWAY HOMES ON THE ISSUES PAPERS
STAGE OF THE PRE-DRAFT WICKLOW TOWN – RATHNEW LOCAL AREA PLAN 2024-
2030**

Dear Sir/Madam,

1.0 INTRODUCTION

- 1.1 This submission is made on behalf of our client, Pathway Homes Ltd., [REDACTED]
[REDACTED]
- 1.2 This submission relates to the public consultation for submissions to inform the Draft Wicklow Town – Rathnew Local Area Plan for the period 2024-2030.

2.0 BACKGROUND AND CONTEXT

- 2.1 Pathway Homes have a number of early-stage interests in land holdings within the Wicklow Town area.
- 2.2 There are a number of key areas identified within the Issues Paper that relate to the areas of Housing, Sustainable Development, Regeneration, Infrastructure and Transport, that our client wishes to comment on broadly in this submission.
- 2.3 The submission points raised are outlined in detail below.

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



3.0 GROUNDS OF SUBMISSION

Housing & Population Targets

- 3.1 It is anticipated that the Wicklow Town-Rathnew area will grow from a population of circa. 16,500 in 2022, to 18,500 in 2028, under the lifetime of the County Development Plan.
- 3.2 It is also anticipated that within that period, an additional 1,500 residential units would be required up to the year 2031, averaging out at around 200 units per year from the adoption of the Local Area Plan.
- 3.3 National Policy Objective 11 within the National Planning Framework, sets out the following in regards to prioritising infill/brownfield led development:
- 'In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.'*
- 3.4 Under the County Development Plan 2022-2028 Chapter 3 Core Strategy, the estimated units available from existing zoned lands from the previous Development Plan, was that of 4,200 units, which was categorised as being **(i)** lands in existing built-up areas totalling 2,000 units & **(ii)** lands outside built up areas totalling 2,200 units.
- 3.5 It was noted within the Core Strategy targets, that in line with the projected unit requirements to 2031 of 1,500 units, there would be an excess supply of 2,200 units based on current zonings, which is calculated to 55ha of zoned lands (based off a 30 units per hectare assumption.)
- 3.6 According to the Core Strategy, 21ha was already under construction at the time of the HNDA being conducted and it stated that any remaining surplus will be addressed in the next LAP for the Wicklow Town-Rathnew area.
- 3.7 It is submitted that in line with the Core Strategy requirements of dezoning existing lands to meet the required figures, the Local Authority should prioritise the downzoning of lands on the periphery of the town areas, and retain as much brownfield, infill development

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



sites as possible, in line with the NPF Policy Objective 11 in Achieving Urban Infill/Brownfield Development.

- 3.8 There should be an increased focus on the delivery of these new homes in the core of the Wicklow Town area, in line with National Policy Objective 3a which aims to *'Deliver at least 40% of all new homes nationally, within built-up footprint of existing settlements.'*
- 3.9 There are key opportunities for increased density and development either through infill and brownfield sites in the town centre and harbour area, repositioning the focus towards more compact settlement growth within our urban areas and addressing the considered excess supply of zoned land under the Development Plan period.

Settlement Growth & Density Levels

- 3.10 The Draft Sustainable Compact Growth Guidelines were recently published, indicating a change in the way urban areas are categorised and defined in terms of the appropriate density measures that should be incorporated into key urban & suburban areas.
- 3.11 The importance of developing on lands around sustainable transport corridors that encourage active travel and public transport use, should be widely encouraged, and enhanced within this new LAP, to ensure that future residential and mixed-use schemes are adequately connected both locally within Wicklow, but further afield towards Dublin City Centre, which remains the key location for commuters and workers travelling out of Wicklow Town.
- 3.12 Based on the geographical locations identified within the compact growth guidelines, Wicklow Town falls within the 'Large Town Centre and Urban Neighbourhood' category, which states the following in relation to density ranges:

'The town centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40-150 dph (net) shall generally be applied in the centres. Larger sites (e.g., strategic brownfield or infill sites) may be capable of defining their own density based on considerations of proximity to the centre, relationship with surrounding built form and accessibility.'

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



- 3.13 The opportunity for enhanced densities in key town centre and public transport accessible sites, such as the Murrough Opportunity Area, should be considered appropriate given its location as a key brownfield site, with good access to the nearby Wicklow Town train station, and closeness to the town centre. It is essential that urban regeneration sites in close proximity to the town centres are facilitated for development through appropriate zoning, in the interests of compact and sustainable growth.
- 3.14 Whilst these guidelines are still in draft form, the recognition of the need to enhance density within key urban areas is recognised as essential to future, sustainable residential development and should be actively promoted within the preparation and development of the Local Area Plan.

Population Growth Expectations

- 3.15 As referred to previously, when considering the extent of zoned land to be included in the LAP, consideration should be given to the Census 2022 data.
- 3.16 Our client recognises the importance that the delivery of much-needed new homes, together with the associated infrastructure on zoned lands, is based on a methodological and policy-based approach as outlined under the HST Methodology set out by the Department of Housing, Local Government & Heritage (hereafter DHLGH).
- 3.17 However, for this to happen, all plans, including the Local Area Plan for Wicklow Town-Rathnew, must take into account the Census 2022 data to ensure that the forecasts for housing needed projected under the HST Methodology, are as accurate as possible so that there is sufficient zoned and serviced land available to accommodate that need.
- 3.18 The population figures identified below highlight that the population targets included in the HNDA for the Wicklow/Rathnew area and are line with the with the actual population growth that has occurred as evidenced by Census 2022 data.

Population 2016 (Census 2016)	Population Wicklow County Council 2016	Unit Completion Projection (2017-2022)	Population 2022 (Based off HNDA Calculations)	Population 2022 (Census 2022)	Population 2028 (HNDA Projection)
10,584 + 3,370 = 13,954	14,114	850 Units x 2.8 Persons = 2,380 Population	2,380 + 14,114 = 16,494	12,957 + 3,482 = 16,439	18,515

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



- 3.19 Any proposal to rezone or restrict growth based on an exclusion of the Census 2022 figures, would be unwise and a failure to reflect past population growth in the settlement area over the period 2016-2022, which stood at a percentage increase of over 16%.
- 3.20 Additionally, the population growth experienced as a result of the Ukrainian & International Protection Migrants seeking accommodation in Ireland over the past 18 months, has resulted in a further increase in the population, including in Wicklow, which had accounted for an additional 2,300 Ukrainians in the County. This figure has not been included within the Census 2022 data, with this figure continuously rising, with further permanent homes required over the lifetime of the Development Plan.
- 3.21 Provision should be made in any instance for a requirement for a review of the Local Area Plan to reflect these new projections from the Census 2022 data and following the NPF update and update to the County Development Plan, which in turn would reconsider the Housing Strategy projections issued from the HNDA strategy.
- 3.22 In this regard, it is respectfully submitted that it would be prudent for the Council to anticipate the requirement for additional zoned land following these reviews, when preparing the Draft Local Area Plan.
- 3.23 Considering the population growth experienced in the Wicklow Town area, it should also be seen appropriate that rather than limiting the development of zoned lands through dezoning, the Local Authority should be upholding the requirement to adopt the National Policy Objective 72a, which states that '*Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.*

Development Management Standards

- 3.24 A key consideration should be given to reduced open space requirements on brownfield sites where high-quality recreation and amenity space exists in the region.
- 3.25 The Wicklow Development Plan apartment and duplex design standards are in excess of the national average which is impacting on brownfield sites viability. These should be assessed on a case-by-case basis in order to bring more brownfield sites into use and make them viable, to allow for the national policy objectives of increased density within town centre areas to be made possible.

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW

**Opportunity for Mixed-Use & Regenerative Development –**

- 3.26 The opportunity for mixed-use development within sites such as The Murrough, opens up the possibility of a sustainable and strategically located neighbourhood development to be created, in the form of residential, commercial, retail, and social infrastructure provided.
- 3.27 The importance of allowing mixed use areas to be developed out around key urban centres, informed through best practice standards and not limited to general policy, density or height restrictions, should be critical elements that are implemented within the final LAP document, as to inform future decisions and development opportunities.
- 3.28 Encouraging the development of car-free or low car dependency, sustainable, medium to high density areas that take advantage both of the natural and visual advantages that places like Wicklow Town offer should be critical in the consideration of mixed-use opportunities within the town area.
- 3.29 Examples of this have already been developed, granted permission, and already commenced works in towns and smaller cities around Ireland, as seen in the examples below from Waterford City, Wexford Town & Kilkenny City.

3.30



Figure 1 - North Quays Development (Waterford City)

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



3.31



Figure 2 - Trinity Wharf Development (Wexford Town)

3.32



Figure 3 - Abbey Quarter Development (Kilkenny City)

Sustainable Transport & Infrastructure Development -

- 3.33 There is an increased focus within the Draft Sustainable Compact Growth Guidelines in relation to higher density and compact residential development, with attention particularly on the provision of reduced car parking and improved active travel measures.
- 3.34 Whilst this is a key component of achieving more sustainable areas in the long term, appropriate infrastructure must be in place for reduced car dependency to be introduced

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



in both existing and new neighbourhoods. This must be factored in, if development decisions are made requiring reduced car parking provisions for new homes.

- 3.35 The sustainable and sequential growth of the Wicklow Town area will need to prioritise the provision of high-quality public transport infrastructure that allows for local and longer distance services to be provided for locals.
- 3.36 The further enhancement of these services, through increased local and private bus operations, increased frequency on the Dublin to Rosslare rail line, or the advancement of park & ride facilities should be prioritised as key infrastructure led objectives within the LAP, in co-ordination with the National Transport Authority & Irish Rail where possible.
- 3.37 In addition, improved pedestrian access to the Wicklow train station should be a short-term priority, to encourage existing and future patronage on the line, increase public transport usage, as well as improving active travel routes out of the town centre area.

4.0 SUMMARY AND CONCLUSIONS

- 4.1 Our client, Pathway Homes, considers the potential for the Wicklow Town-Rathnew Local Area Plan to be of critical importance in the long-term development of the town area in the coming years.
- 4.2 In summary to the grounds made in this submission:
1. There should be a clear focus on the zoning of lands that that facilitate compact infill, brownfield development, with access to sustainable transport modes and achieve National Policy Objectives 3a & 11 in compact growth and infill development prioritisation.
 2. Promote and encourage the implementation of mixed use development proposals to be developed in key urban areas, through informed best-practice standards, that allow for key opportunity or regeneration sites at sustainable and accessible locations to be considered on a case-by-case basis.
 3. Consider 'anticipating' additional housing demand in Wicklow-Rathnew in the near future following publication of NPF update based on 2022 Census, and requirement for a review of the CDP to reflect these new projections.

DUBLIN

5th Floor, The Glass House
11 Coke Lane, Smithfield,
Dublin 7.
D07 WNP2

LIMERICK

11 The Crescent
Limerick,
V94 V2VW



4. The provision of tiered zoning objectives within the plan period should be introduced, to allow under certain circumstances the provision of a variation process to enable future lands to be redesignated and enabled for housing should demand require it.
- 4.3 We respectfully request that this submission is taken into consideration during the preparation of the draft Local Area Plan for the Wicklow Town-Rathnew area.

Yours faithfully,

Robert Keran

Robert Keran

BSc Spatial Planning, BA (Law), LLB, MIPI
Virtus