



Draft Wicklow Rathnew Draft LAP Amendment Stage Submission - Report

Who are you:	Private Individual
Name:	Darragh Mulligan
Reference:	DWTRLAP-123923
Submission Made	March 27, 2025 5:41 PM

Topic

LAP - Proposed Material Amendments No 26 Submission

Submission

Please see the attached document.

File

Proposed Material Amendment 1 and 26 - Wicklow Rathnew Area Development Plan -
Darragh Mulligan.pdf, 0.11MB

For the attention of:

Wicklow Town & Rathnew LAP and

Variation No. 2 to the Wicklow County Development Plan 2022–2028

Administrative Officer, Planning Section

Wicklow County Council

Station Road, Wicklow Town

To Whom It May Concern,

I am writing to formally object to the following proposed material amendments:

- **Proposed Material Amendment No. 1**
 - Amend Table 3.1 New Residential Zoning: Proposed amendments:
 - Glebe (SLO-9) 0.7ha – Linked to essential infrastructure – RN1
 - Glebe (SLO-9) 0.7ha – RN2
- **Proposed Material Amendment No. 26**
 - Change c. 1.4ha at Glebe – Fernhill House from ‘CE Community/Education’ to ‘RN1 New Residential’ (Priority 1) (0.7ha) and ‘RN2 New Residential’ (Priority 2) (0.7ha), as part of the Variation No. 2 to the Wicklow County Development Plan 2022–2028.

While I welcome a plan-led approach to development, I have serious concerns about both the appropriateness of the zoning composition and the practical enforceability of the provisions outlined.

1. Inappropriate Rezoning of Community/Education Lands for Residential Use

The proposed SLO-9 encompasses lands previously zoned entirely as ‘Community/Education’ (CE), now split between residential and other uses. This represents a fundamental change to the original vision for these lands as a community asset. The development of residential units on these lands, even if linked to the regeneration of Fernhill House, risks permanently reducing available lands for vital public infrastructure.

There is no clear evidence or robust justification as to why this land cannot continue to serve essential community purposes, particularly in a town experiencing population growth and increasing demands on public services.

2. Unenforceable Link Between Residential and Community Development

The proposed clause — *"no dwelling units... may be occupied until the CE lands and building are brought into active community / education use"* — is vague, difficult to enforce, and open to interpretation. It raises several critical concerns:

- What constitutes "active use"? Is temporary or token use sufficient?
- How will the community be involved in determining acceptable use or reviewing compliance?
- What enforcement mechanisms are in place to ensure developers do not circumvent or delay this obligation once residential units are built?

Such conditional phasing is highly complex in practice and risks allowing partial development without full delivery of community benefit, particularly if ownership or economic circumstances change.

3. Loss of Historic and Community Value of Fernhill House

Fernhill House, formerly used by the Girl Guides, holds cultural and historical significance. Its inclusion in a development-led framework, rather than a preservation- or restoration-led approach, risks the loss of its character, accessibility, and long-term viability as a community resource.

There is no meaningful commitment within the text to preserve the heritage of the building, engage with local groups, or explore public ownership or stewardship. In its current form, the proposal places the fate of a community asset in the hands of private developers, with limited accountability.

4. Disruption to Local Biodiversity and Threat to Rare Bird Species

The proposed rezoning and associated development also risk significant disruption to local biodiversity. The Glebe/Fernhill area is known to be frequented by a variety of wildlife, including the Great Spotted Woodpecker and the Red Kite—both of which are rare and protected bird species in Ireland. These birds rely on the mature trees and relatively undisturbed habitat currently offered by this site. Development would not only destroy or fragment their habitat but may also introduce prolonged noise, light pollution, and human activity, all of which could deter future nesting or roosting. It is vital that the ecological value of this area is fully assessed and that conservation priorities are not subordinated to development objectives.

5. Premature Zoning of RN1/RN2 Lands

Given the questionable deliverability of CE regeneration, the zoning of large sections of these lands as RN1 and RN2 (residential priorities) is premature. The focus should remain on securing and developing the site for public benefit, not unlocking it for housing unless and until a robust, enforceable community development strategy is in place.

6. Concerns About Proposed Pedestrian/Cycling Connectivity Through Glebemount

The proposed text notes that “development on these lands shall make provision for possible future pedestrian / cycling connectivity between Friarshill and the R750.” While encouraging active travel is generally welcomed, the practical implementation of this connectivity poses a serious risk to the residents of Glebemount Estate, which would become the likely conduit for such a route. Glebemount is already under significant pressure from the volume of traffic, both vehicular and pedestrian. Many homes have multiple cars, and there is limited capacity for additional movement through the estate. Introducing a through-route would:

- Create a substantial increase in footfall and cycling traffic, especially through narrow residential streets which operate as cul-de-sacs today.
- Raise safety concerns, particularly for young children and elderly residents.
- Undermine the quality of life in a residential estate that was not designed to serve as a public thoroughfare.
- Exacerbate existing congestion and parking issues.

For these reasons, any proposals for connectivity must not rely on Glebemount as a primary, secondary, or tertiary link and should seek alternative routing that does not compromise residential amenity or safety.

7. Importance of Ongoing Public Engagement

I wish to acknowledge and commend the ongoing public consultation process as part of the draft Wicklow-Rathnew Local Area Plan. The opportunity for residents and stakeholders to provide input at this stage is vital to ensuring balanced, community-informed planning outcomes.

In this spirit, I respectfully urge that feedback such as this be considered carefully in shaping the final SLO-9 proposal — particularly where it affects valued community assets, residential amenity, and the long-term integrity of the town's planning vision.

Conclusion

For these reasons, I respectfully request that:

- The proposed text for SLO-9 Glebe be withdrawn or significantly revised.
- The 'Community/Education' zoning be retained across the full 3.15ha site.
- A community-led masterplan or feasibility study be undertaken to assess the potential of Fernhill House and its surroundings as a long-term community asset, independent of residential development pressures.
- Any plans for connectivity through residential estates such as Glebemount be explicitly ruled out or subject to detailed public consultation and safety assessment.

Preserving this land for education, culture, and community use is not only consistent with the County Development Plan's broader goals — it is essential for the future wellbeing of Wicklow-Rathnew.

Yours sincerely,
Rick Deady