



Wicklow Town - Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Ronan O'Caoimh
Email Address:	info@ejcarchitects.com
Reference:	WRLAP-152853
Submission Made	September 28, 2023 3:32 PM

Topic

Compact Growth - Housing - Population Growth

Submission

Please refer to the 4 no. attached submission documents in relation to land at Greenhill Road, Dunbur Lower, Ashtown Lane & Broomhall.

Topic

Regeneration of Communities & Places - Healthy Placemaking - Urban Design - Opportunity Sites in Wicklow Town - Rathnew

Submission

Please refer to the 4 no. attached submission documents in relation to land at Greenhill Road, Dunbur Lower, Ashtown Lane & Broomhall.

File

Ashtown Lane Submission.pdf, 1.95MB

Broomhall Submission.pdf, 0.35MB

Dunbur Land Submission.pdf, 0.68MB

Greenhill Road Submission .pdf, 0.95MB



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Administrative Officer,
The Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow,
Co. Wicklow.

27.09.23

Uploaded Via Web-Portal:

RE: Draft Wicklow Town - Rathnew Local Area Plan 2023-2029.

Submission Document – Land at Ashtown Lane, Wicklow Town.

Dear Sir/ Madam,

On behalf of our client, Mr. Ronan O’Caoimh we hereby make the following submission regarding the Draft Wicklow Town - Rathnew Local Area Plan.

This submission is made in relation to land in our client’s ownership at Ashtown Lane, Wicklow Town (Folio Numbers WW 35724F, WW 34031F, WW 341807F, WW 34202F & WW 3483F). Please refer to the location map in Appendix A.

Introduction

Our client purchased the property in 2005 & 2006 at a cost of approximately €800,000 per acre.

The land was zoned for residential and commercial development in the Wicklow Environs/ Rathnew Local Area Plan 2008 to 2014.

It was clearly a devastating blow to our client when the majority of the land was included in a Strategic Land Bank in the 2013 to 2019 Wicklow Town Rathnew Local Area Plan.

All through the intervening 10 year period our client has maintained hope that the land would be zoned for residential development in the upcoming Local Area Plan for the following reasons:

- The land is located within the LAP boundary. It is located close to the centre of Wicklow Town and the relief road (Hawkestown Road).

- The land is fully served with a foul waste connection and the lower levels of the land are served with a mains water connection. Our client would be happy to build a water storage tank and associated infrastructure at his cost to facilitate the development of the more elevated areas of the land.
- Where the land retained a residential zoning in the current LAP our client has applied for permission for residential development on the land. Permission was refused and our client is addressing the reasons for refusal in a new planning application for residential development that will be submitted this year. He is actively trying to establish permission for residential development on the land.
- There is an ongoing housing crisis and it is our client's opinion that the land within the settlement boundary should be zoned for residential development. The land was deemed suitable for residential development previously and was purchased on the basis of being zoned for residential development.
- Our client is a builder. Lowick Developments Ltd. are currently completing 99 dwellings in Delgany. Planning Permission has been obtained following a judicial review for a 232 unit development at the Convent Lands in Delgany where our client intends to build out the development. If the lands at Ashtown Lane are zoned for residential development in the new Local Area Plan it is our client's intention to build much needed high quality houses on the land.

Housing – Population – Compact Growth

This submission addresses the question of where residential development should occur in the future growth of Wicklow Town and Rathnew to provide for c. 1500 new homes up to 2031.

Part of our client's land is currently zoned for Residential Development in the Wicklow Town & Rathnew Local Area Plan (2013 – 2019). This land is comprised within Folio WW 35724F and has an approximate area of 3.5Ha. The extent of the residentially zoned land is indicated on the extract from the zoning map below.

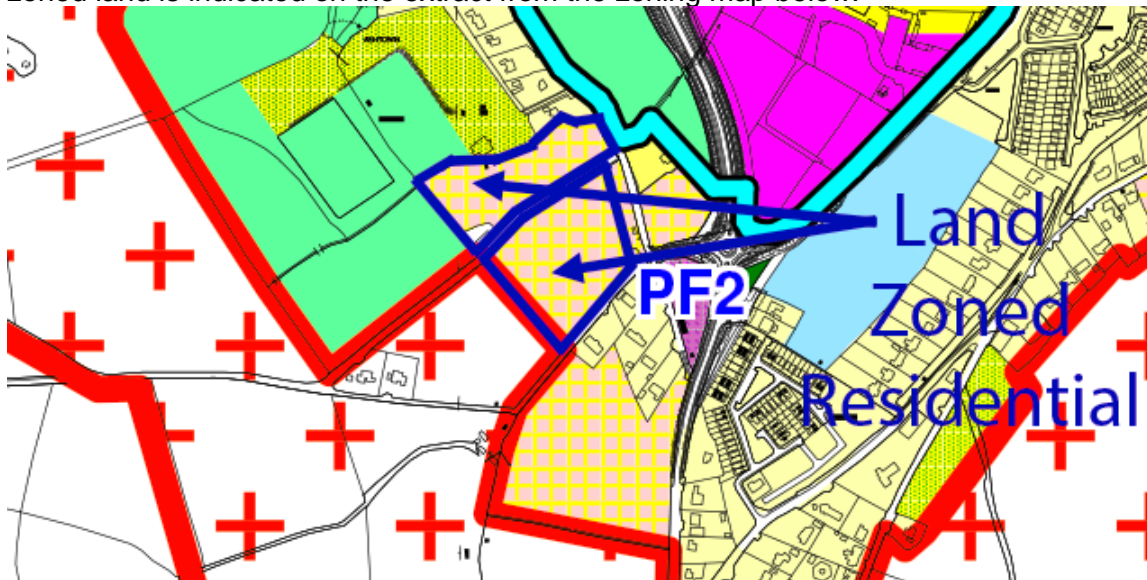


Fig. 1 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land with current residential zoning (outlined in blue line).

Our client requests that the land retain its zoning for Residential Development in the new Local Area Plan for the following reasons:

- 1) The land is situated within the Development Plan Boundary.
- 2) It is located within walking distance (1Km) to the centre of the town and will promote the compact growth of the settlement while at the same time reducing the requirement for vehicular journeys and promoting the use of public transport links.
- 3) Foul Drainage & Mains Water Supply: The land was the subject of an Irish Water pre-connection application for residential development in 2022. Irish Water issued a letter confirming feasibility for foul and mains water connections. Please see Appendix B.
- 4) Surface Water: The land is served by an existing surface water outfall in the form of a stream located in the northeast corner of the land.
- 5) Footpath & Road Access: There is a public footpath connection which currently terminates at the southeast corner of the land. The land is fronting onto Ashtown Lane.
- 6) It is noted that the land is subject to the Residential Zoned Land Tax and is deemed to be serviced, accessible and ready for residential development.
- 7) Sequential Development. The development of the land for residential development would constitute sequential development of the settlement considering the existing established residential development located to the north and south of the land along Ashtown Lane. The Local Authority has also developed land for Social Housing to the south at Ashtown Lane/ R751. In the context of the residential developments surrounding the land it should be regarded as an infill site within the settlement boundary and most suited to future residential development.
The development of the land would not constitute urban sprawl and would add to the orderly development of the established settlement.
- 8) The land will provide for approximately 100 dwelling units applying a residential density of 30 units per hectare as set out in table A in the Core Strategy of the County Development Plan.

The land has been subject to a recent planning application (File Register Reference Number 21/1536) where planning permission was refused relating to design issues. It is our client's intention to submit a new planning application for residential development on the land imminently addressing the reasons for refusal in the previous application.

Compliance with the County Development Plan 2022 – 2028 & Draft Sustainable and Compact Settlements Guidelines for Planning Authorities 2023:

County Development Plan 2022-2026:

The principle for zoning land for residential development is set out in the County Development Plan as follows:

Section 3.5 Zoning

Core Strategy Table 3.7 to follow shows the housing unit requirements for the LAP towns, up to the year 2031 and the housing unit capacity of lands zoned in current LAPs. This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA. Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) shall be assessed against the population and housing targets set out in the Core Strategy of this County Development Plan and the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.

Zoning Principles:

Principle 1: Compact Growth In accordance with National Policy Objectives 3c of the National Planning Framework, a minimum of 30% of the housing growth targeted in any settlement is to be delivered within the existing built up footprint of the settlement.

Principle 2: Delivery of Population and Housing Targets

The zoning provisions of each Local Area Plan and Small Town Plan will be crafted on the basis of ensuring that the population and housing unit targets set out in the tables above can be fulfilled.

Where the targets set out in the tables above can't be fulfilled within the quantum of land identified due the lack of infrastructure as set out in Appendix 9, prioritisation will be given to fulfilling the targets set out in the tables above on land identified within Local Area Plans and Small Town Plans where infrastructure is or will be available and based on the sequential approach set out in Principle 4.

Town centre regeneration / infill / brownfield developments normally located within the existing built up part of the settlement, generally on lands zoned 'town centre', 'village centre', 'primary area', 'existing residential' and other similarly zoned, already developed lands will be prioritised and promoted in the first instance for new housing development,.

Principle 3: Higher Densities It is an objective of the Council to encourage higher residential densities at suitable locations, particularly in existing town / village centres and close to existing or proposed major public transport corridors and nodes.

Principle 4: Sequential approach

The priority locations for new residential development will be:

Priority 1 In the designated 'town' and 'village' / 'neighbourhood centres' or 'primary zone' through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.

Priority 2 Strategic Sites as identified by the RSES and associated MASP.

Priority 3 Infill within the existing built envelope of the town, as defined by the CSO Town boundary.

Priority 4 Where a need for 'greenfield' residential development is identified, the 'two-tier approach' to land zoning as set out in the NPF will be taken i.e.

Tier 1: Serviced Zoned Land

- *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.*
- *These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*
- *Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.*

Tier 2: Serviceable Zoned Land

- *This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.*
- *These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement.*
- *The potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the planning authority at the time of publication of both the draft and final development or area plan. This infrastructural assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies), for example, Irish Water, or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (i.e. within the lifetime of the plan). The planning authority may also commit to the delivery of the required and identified infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning.*

As set out in the NPF, lands that cannot be serviced during the life of a development or area plan by reference to the infrastructural assessment of the planning authority cannot be categorised as either Tier 1 lands or Tier 2 lands per the above and therefore are not

developable within the plan period. Such lands should not be zoned for development or included within a development plan core strategy for calculation purposes.

Statement on compliance with County Development:

The zoning of the land for residential development would be in compliance with the County Development Plan as follows:

1. There is a demand for 1500 new homes in the plan area.
2. There is a requirement that 30% of growth occurs within the 'built up' footprint of the settlement. The land in question is located within the development boundary.
3. Infill developments will be prioritized and promoted in the first instance for new housing development. The land in question can be regarded as an infill site within the settlement boundary. It is surrounded by existing residential development.
4. With regard to the 'Sequential Approach' the land should be regarded as Priority 3. It is not located with the town centre core but is '*Infill within the existing built envelope of the town, as defined by the CSO Town boundary*'.
5. The land is serviced, i.e. it is land that is '*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*'.

Sustainable and Compact Settlements, Guidelines for Planning Authorities *Draft for Consultation August 2023*:

Chapter 3 'Settlement, Place and Density' of the guidelines sets out policy and guidance in relation to the key growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density.

Wicklow Town can be regarded as a Large Town. The land in questions can be regarded as follows:

'Large Town Suburban/Urban Extension Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the built up area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Regional Growth Centres, Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at accessible urban locations (defined in Table 3.7).'

Densities for Residential Development are to be set out using the following steps:

'Step 1: Consideration of Proximity and Accessibility to Services

Planning authorities should encourage densities at or above the mid density range at the most accessible urban locations in each area and densities at the mid to lower end of the range at intermediate and / or peripheral locations. Definitions are provided in Table 3.7 below for the terms 'High Capacity Public Transport Node or Interchange' and for the terms 'Accessible', 'Intermediate' and 'Peripheral' urban location to allow for consistent application of the Guidelines.

These definitions are aligned to the definitions in Section 2.4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities last

issued in 2022. The characteristics detailed in Table 3.7 are not exhaustive and a local assessment will be required.'

Intermediate Urban Location Lands are defined as:

'Intermediate Urban Location Lands within 800 - 1,000 metres (i.e. 10–12 minute walk) of a principal town or suburban centre or a significant employment location(s) that may include a large hospital or third level institution;'

Step 2: Considerations of Local Character and Amenity

While considerations of location and accessibility will have a significant bearing on density, it is also necessary to ensure that the quantum and scale of a development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity or the natural environment.'

Statement on compliance with Sustainable and Compact Settlements, Guidelines for Planning Authorities (Draft 2023):

The zoning of the land for residential development would be in compliance with the Draft Guidelines for Sustainable and Compact Settlements as follows:

The land should be regarded as Intermediate Urban Location lands as it is located within 1,000m of a principal town.

Retaining the zoning of the land for residential development would be consistent with the guidelines for Sustainable and Compact Settlements.

We note that the remaining land in our client's ownership is either zoned for Active Open Space (AOS) or Strategic Land Bank (SLB) in the 2013 – 2019 Local Area Plan.

The land zoned for Active Open Space is within folio WW 35724F and indicated on the 2013 – 2019 LAP zoning map extract below.

Our client requests that this land be zoned for residential development and active open space within the Development Plan boundary (Please refer to figure 4 below).

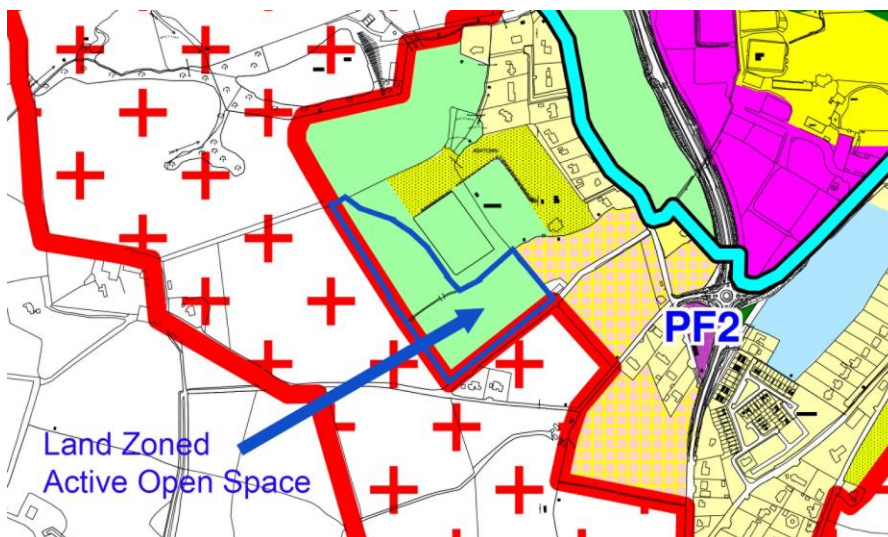


Fig. 2 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land with current Active Open Space zoning (outlined in blue line).

The remainder of land in our client's ownership is within folios WW 35724F, WW 34031F, WW 341807F, WW 34202F & WW 3483F. The land is within the Strategic Land Bank as highlighted on the below extract map from the 2013 – 2019 Local Area Plan Zoning Map.

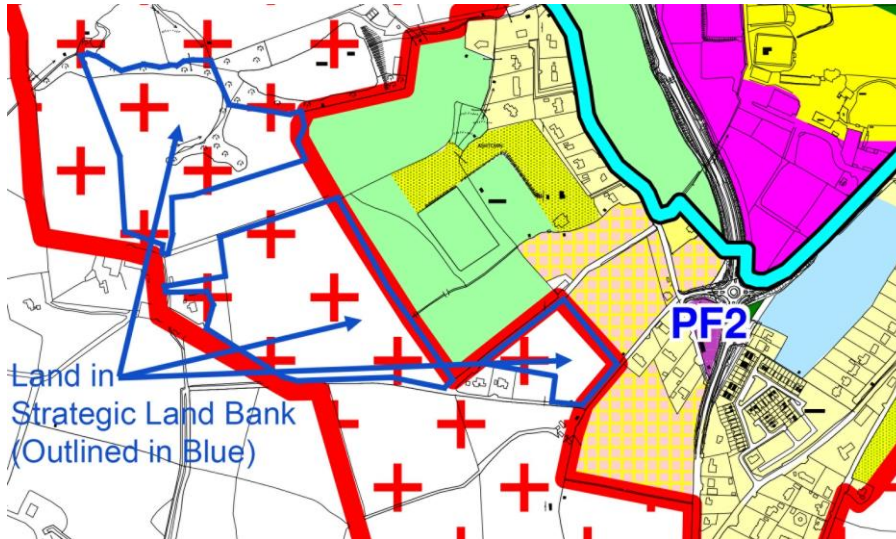


Fig. 3 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land in the Strategic Land Bank (outlined in blue line).

The purpose of the Strategic Land Bank was to retain the land within the Development Boundary of the settlement for future strategic development. It would therefore be appropriate now to consider this land for inclusion with a land use zoning other than Strategic Land Bank in the new plan. The land should be considered for a mixture of uses to promote sustainable development and to reduce the requirement for vehicular journeys. The scope for residential development can be expanded and land can be zoned for commercial and light industrial uses providing employment that is accessible by bicycle and walking to future nearby residential developments. This is in line with the Draft Guidelines for Planning Authorities on Sustainable and Compact Settlements (August 2023). The area is already well served with community and active open space uses and this could be expanded upon in the new plan.

Below is a map indicating potential future uses for the land within the Strategic Land Bank.

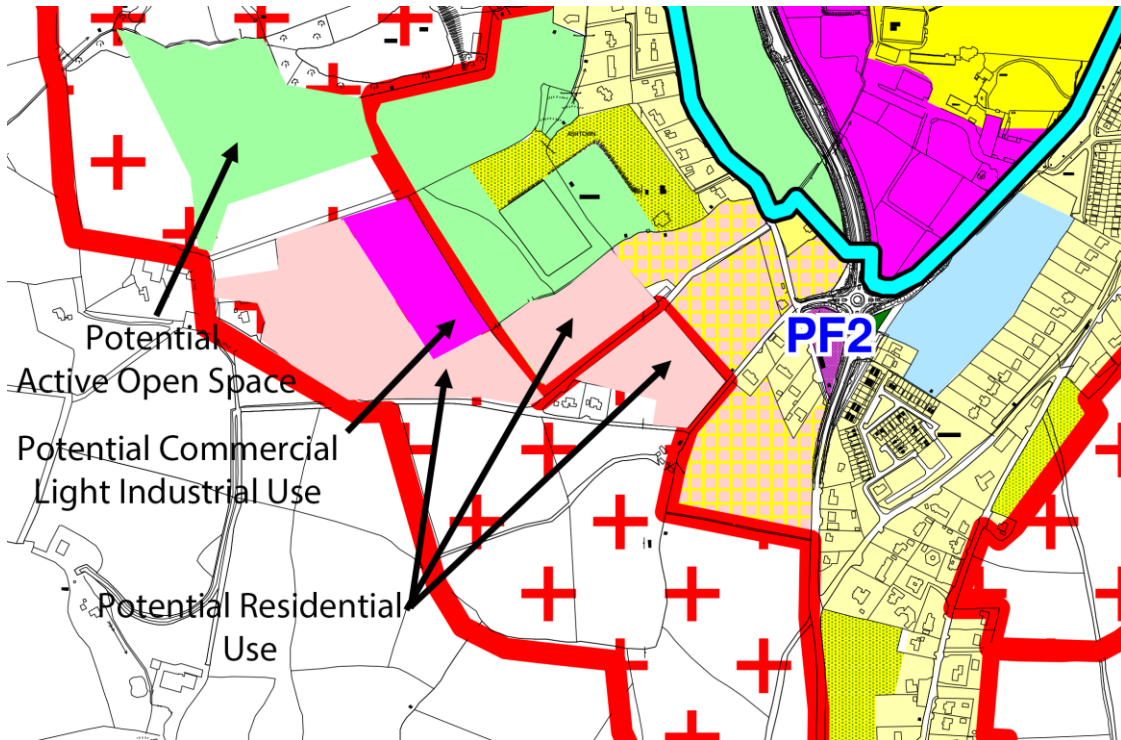


Fig. 4 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating potential land use zoning for land currently with the Strategic Land Bank.

We trust the above items will be considered by the Planning Authority and we request that the land be zoned for Residential Development in the drafting of the new Local Area Plan.

In the meantime, if your department has any questions regarding any of the above please do not hesitate to contact the undersigned.

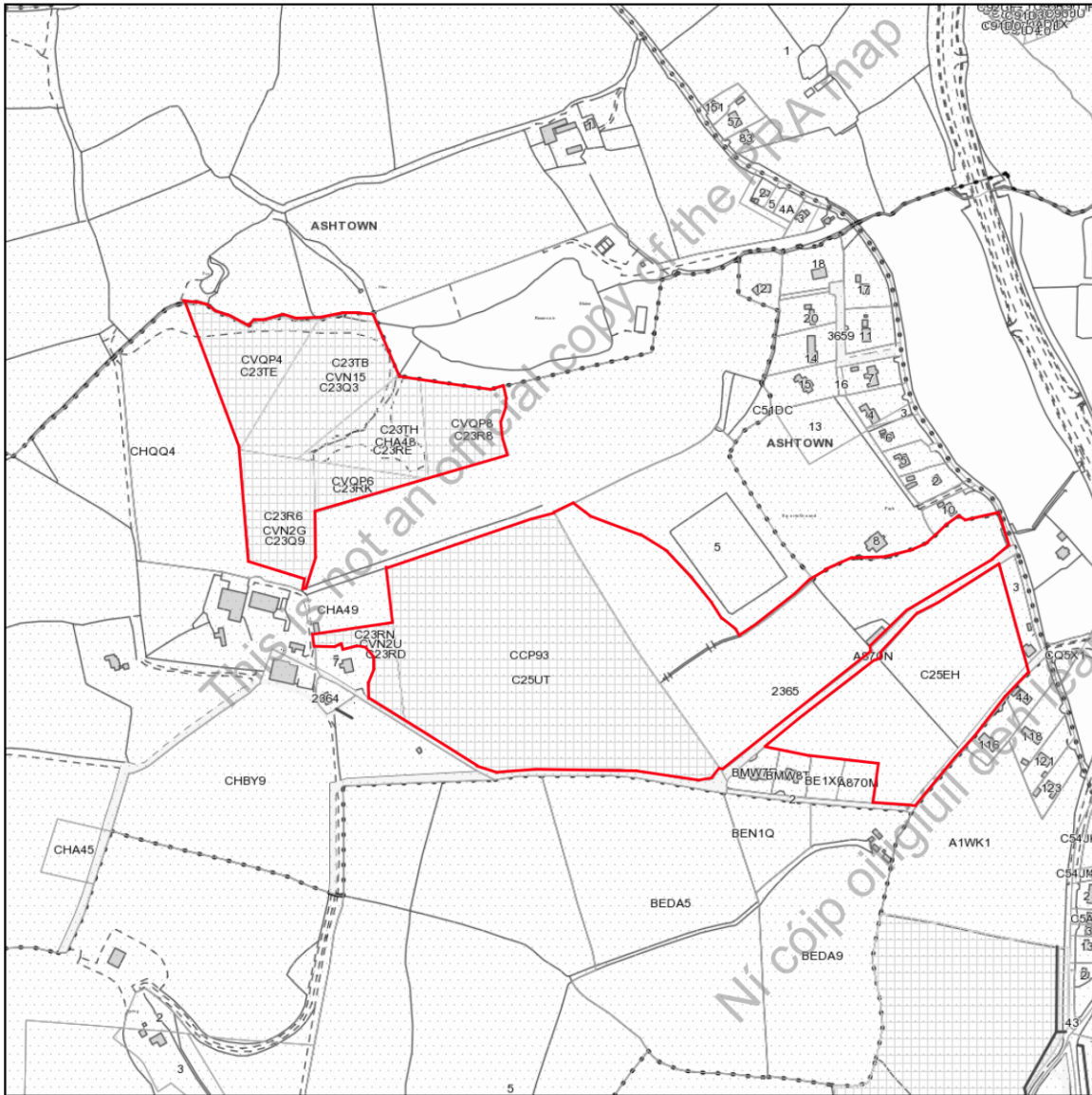
Yours Sincerely,

Eoin J. Carroll MRIAI

For Eoin J. Carroll Architects

cc. Ronan O’Caoimh

Appendix A: Site Location Map (OSI Map)



Appendix B: Irish Water Feasibility Letter

CONFIRMATION OF FEASIBILITY

Stuart Whitney
Classon House
Dundrum Office Park
Dundrum Road
Dublin
Dublin
D14T9T0

Uisce Éireann
Bosca OP 448
Oifig Sheachadta na
Cathrach Theas
Cathair Chorcaí

Uisce Éireann
PO Box 448
South City
Delivery Office
Cork City

www.water.ie

25 September 2023

**Our Ref: CDS23006901 Pre-Connection Enquiry
Ashtown Lane, Ashtown Lane, Wicklow, Wicklow**

Dear Applicant/Agent,

We have completed the review of the Pre-Connection Enquiry.

Uisce Éireann has reviewed the pre-connection enquiry in relation to a Water & Wastewater connection for a Housing Development of 60 unit(s) at Ashtown Lane, Ashtown Lane, Wicklow, Wicklow, (the **Development**).

Based upon the details provided we can advise the following regarding connecting to the networks;

- **Water Connection** - Feasible without infrastructure upgrade by Irish Water
- **Wastewater Connection** - Feasible Subject to upgrades
- To connect this development to Uisce Éireann's foul network a network extension of approx. 290m is required.
The applicant will be responsible for the full cost of this extension.

This letter does not constitute an offer, in whole or in part, to provide a connection to any Uisce Éireann infrastructure. Before the Development can be connected to our network(s) you must submit a connection application and be granted and sign a connection agreement with Uisce Éireann.

Stiúirtheoirí / Directors: Tony Keohane (Cathaoirleach / Chairman), Niall Gleeson (POF / CEO), Christopher Banks, Fred Barry, Gerard Britchfield, Liz Joyce, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh.

Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin, Ireland D01NP86

Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Uisce Éireann is a design activity company, limited by shares. Cláraithe in Éirinn Uimh.: 530363 / Registered in Ireland No.: 530363.

As the network capacity changes constantly, this review is only valid at the time of its completion. As soon as planning permission has been granted for the Development, a completed connection application should be submitted. The connection application is available at www.water.ie/connections/get-connected/

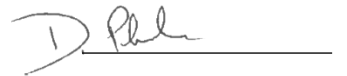
Where can you find more information?

- **Section A** - What is important to know?
- **Section B** - Details of Uisce Éireann's Network(s)

This letter is issued to provide information about the current feasibility of the proposed connection(s) to Uisce Éireann's network(s). This is not a connection offer and capacity in Uisce Éireann's network(s) may only be secured by entering into a connection agreement with Uisce Éireann.

For any further information, visit www.water.ie/connections, email newconnections@water.ie or contact 1800 278 278.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'D. Phelan', is written over a horizontal line.

Dermot Phelan
Connections Delivery Manager

Section A - What is important to know?

What is important to know?	Why is this important?
Do you need a contract to connect?	<ul style="list-style-type: none"> • Yes, a contract is required to connect. This letter does not constitute a contract or an offer in whole or in part to provide a connection to Uisce Éireann's network(s). • Before the Development can connect to Uisce Éireann's network(s), you must submit a connection application <u>and be granted and sign</u> a connection agreement with Uisce Éireann.
When should I submit a Connection Application?	<ul style="list-style-type: none"> • A connection application should only be submitted after planning permission has been granted.
Where can I find information on connection charges?	<ul style="list-style-type: none"> • Uisce Éireann connection charges can be found at: https://www.water.ie/connections/information/charges/
Who will carry out the connection work?	<ul style="list-style-type: none"> • All works to Uisce Éireann's network(s), including works in the public space, must be carried out by Uisce Éireann*. <p>*Where a Developer has been granted specific permission and has been issued a connection offer for Self-Lay in the Public Road/Area, they may complete the relevant connection works</p>
Fire flow Requirements	<ul style="list-style-type: none"> • The Confirmation of Feasibility does not extend to fire flow requirements for the Development. Fire flow requirements are a matter for the Developer to determine. • What to do? - Contact the relevant Local Fire Authority
Plan for disposal of storm water	<ul style="list-style-type: none"> • The Confirmation of Feasibility does not extend to the management or disposal of storm water or ground waters. • What to do? - Contact the relevant Local Authority to discuss the management or disposal of proposed storm water or ground water discharges.
Where do I find details of Uisce Éireann's network(s)?	<ul style="list-style-type: none"> • Requests for maps showing Uisce Éireann's network(s) can be submitted to: datarequests@water.ie

<p>What are the design requirements for the connection(s)?</p>	<ul style="list-style-type: none"> The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this Development shall comply with <i>the Uisce Éireann Connections and Developer Services Standard Details and Codes of Practice</i>, available at www.water.ie/connections
<p>Trade Effluent Licensing</p>	<ul style="list-style-type: none"> Any person discharging trade effluent** to a sewer, must have a Trade Effluent Licence issued pursuant to section 16 of the Local Government (Water Pollution) Act, 1977 (as amended). More information and an application form for a Trade Effluent License can be found at the following link: https://www.water.ie/business/trade-effluent/about/ <p>**trade effluent is defined in the Local Government (Water Pollution) Act, 1977 (as amended)</p>

Section B – Details of Uisce Éireann’s Network(s)

The map included below outlines the current Uisce Éireann infrastructure adjacent the Development: To access Uisce Éireann Maps email

datarequests@water.ie



Reproduced from the Ordnance Survey of Ireland by Permission of the Government. License No. 3-3-34

Note: The information provided on the included maps as to the position of Uisce Éireann’s underground network(s) is provided as a general guide only. The information is based on the best available information provided by each Local Authority in Ireland to Uisce Éireann.

Whilst every care has been taken in respect of the information on Uisce Éireann’s network(s), Uisce Éireann assumes no responsibility for and gives no guarantees, undertakings or warranties concerning the accuracy, completeness or up to date nature of the information provided, nor does it accept any liability whatsoever arising from or out of any errors or omissions. This information should not be solely relied upon in the event of excavations or any other works being carried out in the vicinity of Uisce Éireann’s underground network(s). The onus is on the parties carrying out excavations or any other works to ensure the exact location of Uisce Éireann’s underground network(s) is identified prior to excavations or any other works being carried out. Service connection pipes are not generally shown but their presence should be anticipated.



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Administrative Officer,
The Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow,
Co. Wicklow.

27.09.23

Uploaded Via Web-Portal:

RE: Draft Wicklow Town - Rathnew Local Area Plan 2023-2029.

Submission Document – Land at Broomhall, Rathnew

Dear Sir/ Madam,

On behalf of our client, Mr. Ronan O’Caoimh we hereby make the following submission regarding the Draft Wicklow Town - Rathnew Local Area Plan.

This submission is made in relation to land in our client’s ownership at Broomhall, Rathnew - Wicklow Town (Folio Number WW 353703F). Please refer to the location map in Appendix A.

Introduction

The property was purchased in 2006 at substantial cost to our client. The land was zoned for residential development in the Wicklow Environs/ Rathnew Local Area Plan 2008 to 2014.

It was clearly a devastating blow to our client for the land to be included in a Strategic Land Bank in the 2013 to 2019 Wicklow Town Rathnew Local Area Plan.

All through the intervening 10 year period our client has maintained hope that the land would be zoned for residential development in the upcoming Local Area Plan for the following reasons:

- The land is located adjacent to zoned and serviced land and existing residential developments.

- There is an ongoing housing crisis and it is our client's opinion that the land within the settlement boundary should be zoned for residential development. The land was deemed suitable for residential development previously and was purchased on the basis of being zoned for residential development.
- Our client is a builder. Lowick Developments Ltd. are currently completing 99 dwellings in Delgany. Planning Permission has been obtained following a judicial review for a 232 unit development at the Convent Lands in Delgany where our client intends to build out the development. If the lands at Broomhall are zoned for residential development in the new Local Area Plan it is our client's intention to build much needed high quality houses on the land.

Housing – Population – Compact Growth

This submission addresses the question of where residential development should occur in the future growth of Wicklow Town and Rathnew to provide for c. 1500 new homes up to 2031.

Our client's land is currently zoned Strategic Land Bank in the Wicklow Town & Rathnew Local Area Plan (2013 – 2019). This land is comprised within Folio WW 35724F and has an approximate area of 0.8Ha.

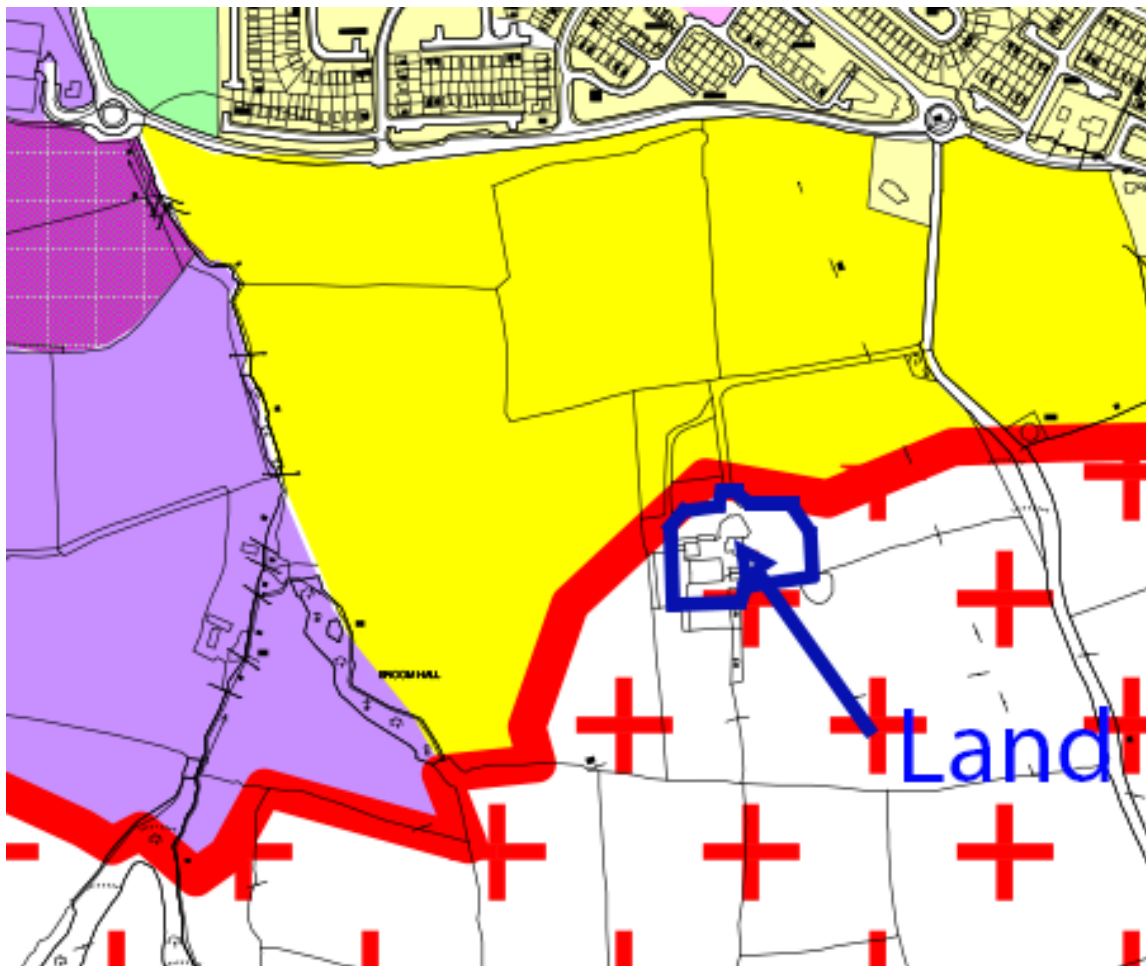


Fig. 1 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land in Strategic Land Bank (outlined in blue line).

Our client requests that the land directly north of his ownership retain its zoning for Residential Development in the new Local Area Plan and that the area within his ownership including the curtilage of Broomhall House be included for residential development in the new plan for the following reasons:

- 1) The land is situated within the Development Plan Boundary.
- 2) It is located within walking distance (1Km) to the centre of Rathnew and will promote the compact growth of the settlement while at the same time reducing the requirement for vehicular journeys and promoting the use of public transport links.
- 3) Sequential Development. The development of the land for residential development would constitute sequential development of the settlement considering the existing established residential developments located to the north at Waverly Drive and Kirvin Hill (Planning Permission Register Reference Numbers: 13/8739, 16/1133 & 18/50). In the context of the residential developments surrounding the land it should be regarded as an infill site within the settlement boundary and most suited to future residential development. The development of the land would not constitute urban sprawl and would add to the orderly development of the established settlement.
- 4) The land will provide for approximately 24 dwelling units applying a residential density of 30 units per hectare as set out in table A in the Core Strategy of the County Development Plan.

Compliance with the County Development Plan 2022 – 2028 & Draft Sustainable and Compact Settlements Guidelines for Planning Authorities 2023:

County Development Plan 2022-2026:

The principle for zoning land for residential development is set out in the County Development Plan as follows:

Section 3.5 Zoning

Core Strategy Table 3.7 to follow shows the housing unit requirements for the LAP towns, up to the year 2031 and the housing unit capacity of lands zoned in current LAPs. This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA. Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) shall be assessed against the population and housing targets set out in the Core Strategy of this County Development Plan and the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.

Zoning Principles:

Principle 1: Compact Growth In accordance with National Policy Objectives 3c of the National Planning Framework, a minimum of 30% of the housing growth targeted in any settlement is to be delivered within the existing built up footprint of the settlement.

Principle 2: Delivery of Population and Housing Targets

The zoning provisions of each Local Area Plan and Small Town Plan will be crafted on the basis of ensuring that the population and housing unit targets set out in the tables above can be fulfilled.

Where the targets set out in the tables above can't be fulfilled within the quantum of land identified due the lack of infrastructure as set out in Appendix 9, prioritisation will be given to fulfilling the targets set out in the tables above on land identified within Local Area Plans and Small Town Plans where infrastructure is or will be available and based on the sequential approach set out in Principle 4.

Town centre regeneration / infill / brownfield developments normally located within the existing built up part of the settlement, generally on lands zoned 'town centre', 'village centre', 'primary area', 'existing residential' and other similarly zoned, already developed lands will be prioritised and promoted in the first instance for new housing development,.

Principle 3: Higher Densities It is an objective of the Council to encourage higher residential densities at suitable locations, particularly in existing town / village centres and close to existing or proposed major public transport corridors and nodes.

Principle 4: Sequential approach

The priority locations for new residential development will be:

Priority 1 In the designated 'town' and 'village' / 'neighbourhood centres' or 'primary zone' through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.

Priority 2 Strategic Sites as identified by the RSES and associated MASP.

Priority 3 Infill within the existing built envelope of the town, as defined by the CSO Town boundary.

Priority 4 Where a need for 'greenfield' residential development is identified, the 'two-tier approach' to land zoning as set out in the NPF will be taken i.e.

Tier 1: Serviced Zoned Land

- *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.*

- *These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*

- *Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.*

Tier 2: Serviceable Zoned Land

- *This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.*

- *These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement.*

- *The potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the planning authority at the time of publication of both the draft and final development or area plan.*

This infrastructural assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies), for example, Irish Water, or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (i.e. within the lifetime of the plan). The planning authority may also commit to the delivery of the required and identified infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning.

As set out in the NPF, lands that cannot be serviced during the life of a development or area plan by reference to the infrastructural assessment of the planning authority cannot be categorised as either Tier 1 lands or Tier 2 lands per the above and therefore are not developable within the plan period. Such lands should not be zoned for development or included within a development plan core strategy for calculation purposes.

Statement on compliance with County Development:

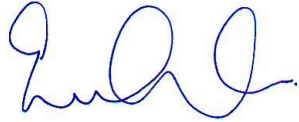
The zoning of the land for residential development would be in compliance with the County Development Plan as follows:

1. There is a demand for 1500 new homes in the plan area.
2. There is a requirement that 30% of growth occurs within the 'built up' footprint of the settlement. The land in question is located within the development boundary.
3. Infill developments will be prioritized and promoted in the first instance for new housing development. The land in question can be regarded as an infill site within the settlement boundary.
4. With regard to the 'Sequential Approach' the land should be regarded as Priority 3. It is not located with the town centre core but is '*Infill within the existing built envelope of the town, as defined by the CSO Town boundary*'.
5. The land is serviceable, i.e. it is land that has '*potential to become fully serviced within the life of the plan*'.

We trust the above items will be considered by the Planning Authority and we request that the land be zoned for Residential Development in the drafting of the new Local Area Plan.

In the meantime, if your department has any questions regarding any of the above please do not hesitate to contact the undersigned.

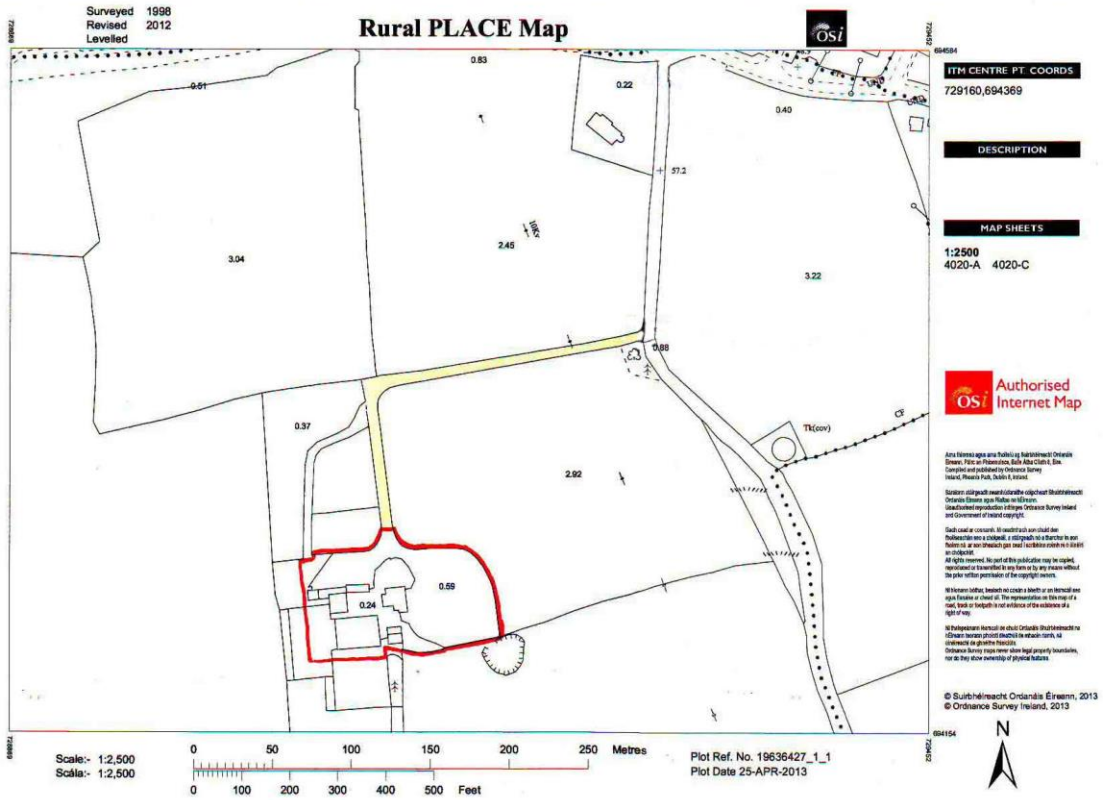
Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'EJC', written in a cursive style.

Eoin J. Carroll MRIAI
For *Eoin J. Carroll Architects*

cc. *Ronan O’Caoimh*

Appendix A: Site Location Map (OSI Map)





Eoin J. Carroll Architects

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IDA Business Park, Bray
Co. Wicklow
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Administrative Officer,
The Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow,
Co. Wicklow.

27.09.23

Uploaded Via Web-Portal:

RE: Draft Wicklow Town - Rathnew Local Area Plan 2023-2029.

Submission Document – Land at Dunbur Lower, Wicklow Town

Dear Sir/ Madam,

On behalf of our client, Mr. Ronan O’Caoimh we hereby make the following submission regarding the Draft Wicklow Town - Rathnew Local Area Plan.

This submission is made in relation to land in our client’s ownership at Dunbur Lower, Wicklow Town (Folio Number WW 10956F).

Please refer to the OSI map identifying the location of the extents of the land in Appendix A. The land has an area of circa 6.8Ha.

Introduction

Our client purchased the property in 2006 at a cost of approximately €615,000 per acre. The land was zoned for residential development in the Wicklow Environs/ Rathnew Local Area Plan 2008 to 2014.

It was clearly a devastating blow to our client for the land to be included in a Strategic Land Bank in the 2013 to 2019 Wicklow Town Rathnew Local Area Plan.

All through the intervening 10 year period our client has maintained hope that the land would be zoned for residential development in the upcoming Local Area Plan for the following reasons:

- The land is located with the town boundary (the boundary as defined by the CSO).
- The land is adjacent to taken in charge and fully serviced developments.

- There is an ongoing housing crisis and it is our client's opinion that the land within the settlement boundary should be zoned for residential development. The land was deemed suitable for residential development previously and was purchased on the basis of being zoned for residential development.
- Our client is a builder. Lowick Developments Ltd. are currently completing 99 dwellings in Delgany. Planning Permission has been obtained following a judicial review for a 232 unit development at the Convent Lands in Delgany where our client intends to build out the development. If the lands at Dunbur Lower are zoned for residential development in the new Local Area Plan it is our client's intention to build much needed high quality houses on the land.

Housing – Population – Compact Growth

This submission addresses the question of where residential development should occur in the future growth of Wicklow Town and Rathnew to provide for c. 1500 new homes up to 2031.

Our client requests that the land be zoned for Residential Development in the new Local Area Plan for the following reasons:

- 1) The land is located within walking distance (1.5Km) to the centre of the town and will promote the compact growth of the settlement while at the same time reducing the requirement for vehicular journeys and promoting the use of public transport links.
- 2) Foul Drainage & Mains Water Connection: Connection to existing mains foul sewers and mains water connection at the adjoining residential development at the existing 'Seacliff' residential development is feasible.
- 3) Footpath & Road Access: Footpath and Road access to the lands is feasible through the adjoining 'Seacliff' Residential Development. Seacliff is taken in charge. The below image indicates the potential future access link to the lands via Seacliff.



Fig. 1 Image of potential road and footpath link to land.

- 4) **Sequential Development.** The development of the land for residential development would constitute sequential development of the settlement considering the existing established residential developments located to the north of the land at Seaclyff and Yachtman’s Point. The land is directly adjacent to two residential developments and the future development of the land would be in sequence.
The development of the land would not constitute urban sprawl and would add to the orderly development of the established settlement.
- 5) The land will provide for approximately 200 dwelling units applying a residential density of 30 units per hectare as set out in table A in the Core Strategy of the County Development Plan.

Below is a masterplan indicating how quality residential development can be achieved on the land. It is expected that the development would consist of a mix of types of dwellings and tenure including duplex apartments, terraced dwellings and townhouses.



Fig. 2 Image of potential masterplan for residential development of the land.

Compliance with the County Development Plan 2022 – 2028:

County Development Plan 2022-2026:

The principle for zoning land for residential development is set out in the County Development Plan as follows:

Section 3.5 Zoning

Core Strategy Table 3.7 to follow shows the housing unit requirements for the LAP towns, up to the year 2031 and the housing unit capacity of lands zoned in current LAPs. This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA. Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) shall be assessed against the population and housing targets set out in the Core Strategy of this County Development Plan and the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.

Zoning Principles:

Principle 1: Compact Growth In accordance with National Policy Objectives 3c of the National Planning Framework, a minimum of 30% of the housing growth targeted in any settlement is to be delivered within the existing built up footprint of the settlement.

Principle 2: Delivery of Population and Housing Targets

The zoning provisions of each Local Area Plan and Small Town Plan will be crafted on the basis of ensuring that the population and housing unit targets set out in the tables above can be fulfilled.

Where the targets set out in the tables above can't be fulfilled within the quantum of land identified due the lack of infrastructure as set out in Appendix 9, prioritisation will be given to fulfilling the targets set out in the tables above on land identified within Local Area Plans and Small Town Plans where infrastructure is or will be available and based on the sequential approach set out in Principle 4.

Town centre regeneration / infill / brownfield developments normally located within the existing built up part of the settlement, generally on lands zoned 'town centre', 'village centre', 'primary area', 'existing residential' and other similarly zoned, already developed lands will be prioritised and promoted in the first instance for new housing development,.

Principle 3: Higher Densities It is an objective of the Council to encourage higher residential densities at suitable locations, particularly in existing town / village centres and close to existing or proposed major public transport corridors and nodes.

Principle 4: Sequential approach

The priority locations for new residential development will be:

Priority 1 In the designated 'town' and 'village' / 'neighbourhood centres' or 'primary zone' through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.

Priority 2 Strategic Sites as identified by the RSES and associated MASP.

Priority 3 Infill within the existing built envelope of the town, as defined by the CSO Town boundary.

Priority 4 Where a need for 'greenfield' residential development is identified, the 'two-tier approach' to land zoning as set out in the NPF will be taken i.e.

Tier 1: Serviced Zoned Land

- *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.*
- *These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*
- *Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.*

Tier 2: Serviceable Zoned Land

- *This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.*
- *These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement.*
- *The potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the planning authority at the time of publication of both the draft and final development or area plan. This infrastructural assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies), for example, Irish Water, or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (i.e. within the lifetime of the plan). The planning authority may also commit to the delivery of the required and identified infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning.*

As set out in the NPF, lands that cannot be serviced during the life of a development or area plan by reference to the infrastructural assessment of the planning authority cannot be categorised as either Tier 1 lands or Tier 2 lands per the above and therefore are not developable within the plan period. Such lands should not be zoned for development or included within a development plan core strategy for calculation purposes.

Statement on compliance with County Development:

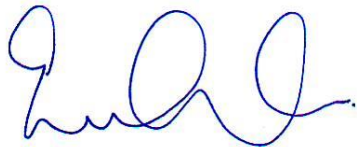
The zoning of the land for residential development would be in compliance with the County Development Plan as follows:

1. There is a demand for 1500 new homes in the plan area.
2. With regard to the 'Sequential Approach' the land should be regarded as Priority 4, *Where a need for 'greenfield' residential development is identified, the 'two-tier approach' to land zoning as set out in the NPF will be taken.*
3. The land is considered as Tier 2 Serviceable Zoned Land. These lands are contiguous to existing developed lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement. Connection to services would be feasible via the adjacent serviced and taken in charge residential development at Seacliff.

We trust the above items will be considered by the Planning Authority and we request that the land be zoned for Residential Development in the drafting of the new Local Area Plan.

In the meantime if your department has any questions regarding any of the above please do not hesitate to contact the undersigned.

Yours Sincerely,

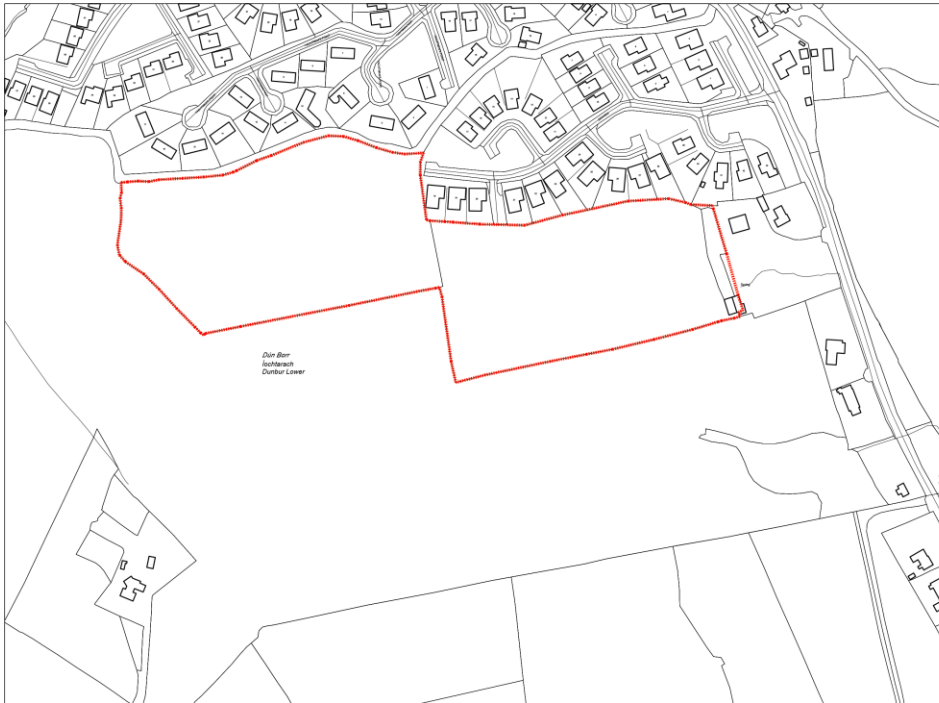


Eoin J. Carroll MRIA

For Eoin J. Carroll Architects

cc. Ronan O'Caoimh

Appendix A: Site Location Map (OSI Map)



N

Drawn By:	_____
Scale:	1:_____
North Arrow:	_____
Sheet No. / Total:	_____ / _____
Project / Site Reference:	_____
File Name:	_____
Project Path:	_____
Project Folder:	_____
Project Name:	_____
Project Location:	_____
Project Date:	_____
Project Version:	_____
Project Status:	_____
Project Manager:	_____
Project Engineer:	_____
Project Designer:	_____
Project Checker:	_____
Project Approver:	_____
Project User:	_____
Project Password:	_____

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Administrative Officer,
The Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow,
Co. Wicklow.

27.09.23

Uploaded Via Web-Portal:

RE: Draft Wicklow Town - Rathnew Local Area Plan 2023-2029.

Submission Document – Land at Greenhill Road, Wicklow Town

Dear Sir/ Madam,

On behalf of our client, Mr. Ronan O’Caoimh we hereby make the following submission regarding the Draft Wicklow Town - Rathnew Local Area Plan.

This submission is made in relation to land in our client’s ownership at Greenhill Road, Wicklow Town (Folio Numbers WW 32529F & WW 13717F).

Please refer to the OSI map identifying the location of the extents of the land in Appendix A. The land has an area of circa 4Ha.

Introduction

Our client purchased the property in 2004 at a cost of approximately €700,000 per acre. The land was zoned for residential development in the Wicklow Town Plan 2007 to 2013.

It was clearly a devastating blow to our client for the land to be included in a Strategic Land Bank in the 2013 to 2019 Wicklow Town Rathnew Local Area Plan.

All through the intervening 10 year period our client has maintained hope that the land would be zoned for residential development in the upcoming Local Area Plan for the following reasons:

- The land is located with the town boundary (the boundary as defined by the CSO).
- The land is fully serviced.
- There is an ongoing housing crisis and it is our client's opinion that the land within the settlement boundary should be zoned for residential development. The land was deemed suitable for residential development previously and was purchased on the basis of being zoned for residential development.
- Our client is a builder. Lowick Developments Ltd. are currently completing 99 dwellings in Delgany. Planning Permission has been obtained following a judicial review for a 232 unit development at the Convent Lands in Delgany where our client intends to build out the development. If the lands at Greenhill Road are zoned for residential development in the new Local Area Plan it is our client's intention to build much needed high quality houses on the land.

Housing – Population – Compact Growth

This submission addresses the question of where residential development should occur in the future growth of Wicklow Town and Rathnew to provide for c. 1500 new homes up to 2031.

Our client requests that the land be zoned for Residential Development in the new Local Area Plan for the following reasons:

- 1) The land is situated within the Wicklow Town Boundary.

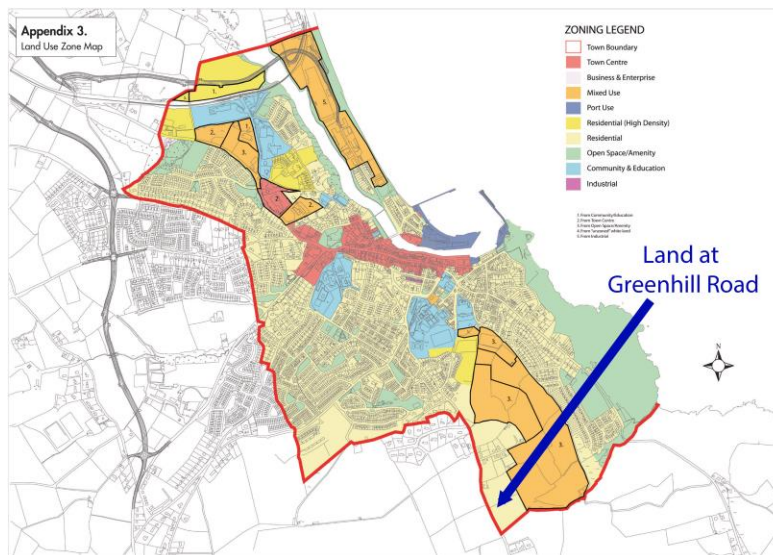


Fig. 1 Extract from Wicklow Town Plan 2007-2013 indicating land with the town boundary (red line).

- 2) It is located within walking distance (1Km) to the centre of the town and will promote the compact growth of the settlement while at the same time reducing the requirement for vehicular journeys and promoting the use of public transport links.
- 3) Foul Drainage: The land is serviced with an existing foul drainage connection. There is an existing foul drain serving the land which also serves the Mariner's

Point development to the west of the land. This foul connection is indicated on the below drainage drawing extract submitted as part of Planning Permission 22/504 on the lands adjacent to Mariner's Point. A photo of the foul manholes on the land are also indicated below.



Fig. 2 Extract from Drainage Layout Planning File Ref: 22/504.



Figs. 3 & 4: Photos of existing foul manholes on the land.

- 4) Mains Water: The land is served by an existing water storage tank located at a higher level on the lands to the west of Mariner's Point. There is capacity in this tank to accommodate development on the land. Should Irish Water require an upgrade to infrastructure our client would accommodate the provision of water storage on the land if required.
- 5) Footpath & Road Access: There is a public footpath connection which currently terminates at the northwest corner of the land. Works to extend the footpath along the road side boundary of the land are planned and supported by our client. This footpath will be in place when the new plan is adopted.

The land is fronting onto Greenhill Road. It has direct road access and does not require access across any third party lands.



Fig. 5 Image of existing public footpath to the corner of the land.

- 6) Sequential Development. The development of the land for residential development would constitute sequential development of the settlement considering the existing established residential development located to the west of the land at Mariner's Point and directly adjacent to the north of the land at Carraig View. We also refer to Planning Permission 22/504 where permission was granted in January 2023 for 74 dwellings on the land directly across Greenhill Road to the west of the land. In the context of the residential developments surrounding the land it should be regarded as an infill site within the town boundary and most suited to future residential development. The development of the land would not constitute urban sprawl and would add to the orderly development of the established settlement.
- 7) The land will provide for approximately 120 dwelling units applying a residential density of 30 units per hectare as set out in table A in the Core Strategy of the County Development Plan.

Below is a masterplan indicating how quality residential development can be achieved on the land. It is expected that the development would consist of a mix of types of dwellings and tenure including duplex apartments, terraced dwellings and townhouses.

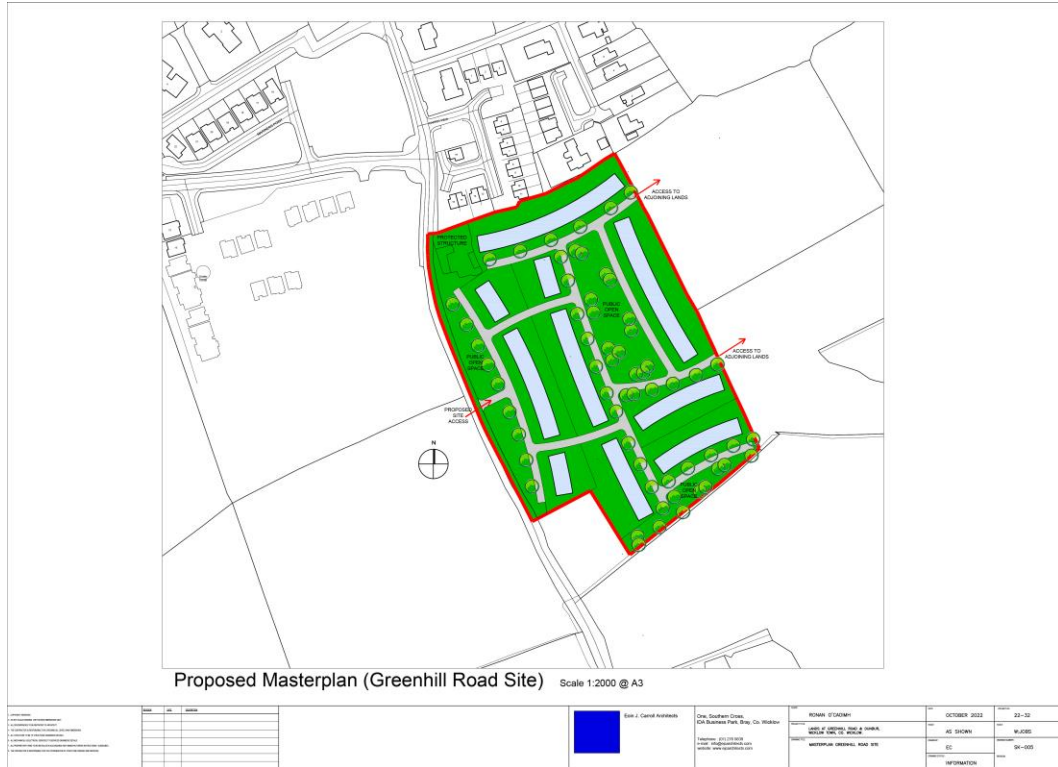


Fig. 6 Image of potential masterplan for residential development of the land.

Compliance with the County Development Plan 2022 – 2028 & Draft Sustainable and Compact Settlements Guidelines for Planning Authorities 2023:

County Development Plan 2022-2026:

The principle for zoning land for residential development is set out in the County Development Plan as follows:

Section 3.5 Zoning

Core Strategy Table 3.7 to follow shows the housing unit requirements for the LAP towns, up to the year 2031 and the housing unit capacity of lands zoned in current LAPs. This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA. Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) shall be assessed against the population and housing targets set out in the Core Strategy of this County Development Plan and the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.

Zoning Principles:

Principle 1: Compact Growth In accordance with National Policy Objectives 3c of the National Planning Framework, a minimum of 30% of the housing growth targeted in any settlement is to be delivered within the existing built up footprint of the settlement.

Principle 2: Delivery of Population and Housing Targets

The zoning provisions of each Local Area Plan and Small Town Plan will be crafted on the basis of ensuring that the population and housing unit targets set out in the tables above can be fulfilled.

Where the targets set out in the tables above can't be fulfilled within the quantum of land identified due the lack of infrastructure as set out in Appendix 9, prioritisation will be given to fulfilling the targets set out in the tables above on land identified within Local Area Plans and Small Town Plans where infrastructure is or will be available and based on the sequential approach set out in Principle 4.

Town centre regeneration / infill / brownfield developments normally located within the existing built up part of the settlement, generally on lands zoned 'town centre', 'village centre', 'primary area', 'existing residential' and other similarly zoned, already developed lands will be prioritised and promoted in the first instance for new housing development,.

Principle 3: Higher Densities It is an objective of the Council to encourage higher residential densities at suitable locations, particularly in existing town / village centres and close to existing or proposed major public transport corridors and nodes.

Principle 4: Sequential approach

The priority locations for new residential development will be:

Priority 1 In the designated 'town' and 'village' / 'neighbourhood centres' or 'primary zone' through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.

Priority 2 Strategic Sites as identified by the RSES and associated MASP.

Priority 3 Infill within the existing built envelope of the town, as defined by the CSO Town boundary.

Priority 4 Where a need for 'greenfield' residential development is identified, the 'two-tier approach' to land zoning as set out in the NPF will be taken i.e.

Tier 1: Serviced Zoned Land

- *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.*

- *These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*

- *Inclusion in Tier 1 will generally require the lands to within the footprint of or spatially sequential within the identified settlement.*

Tier 2: Serviceable Zoned Land

- *This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.*

- *These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement.*

- *The potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the planning authority at the time of publication of both the draft and final development or area plan. This infrastructural assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies), for example, Irish Water, or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (i.e. within the lifetime of the plan). The planning authority may also commit to the delivery of the required and identified infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning.*

As set out in the NPF, lands that cannot be serviced during the life of a development or area plan by reference to the infrastructural assessment of the planning authority cannot be categorised as either Tier 1 lands or Tier 2 lands per the above and therefore are not developable within the plan period. Such lands should not be zoned for development or included within a development plan core strategy for calculation purposes.

Statement on compliance with County Development:

The zoning of the land for residential development would be in compliance with the County Development Plan as follows:

1. There is a demand for 1500 new homes in the plan area.
2. There is a requirement that 30% of growth occurs within the 'built up' footprint of the settlement. The land in question is located within the town boundary and within the 'built up' footprint of the settlement.
3. Infill developments will be prioritized and promoted in the first instance for new housing development. The land in question can be regarded as an infill site within the settlement boundary. It is surrounded by existing residential development and permitted residential development.
4. With regard to the 'Sequential Approach' the land should be regarded as Priority 3. It is not located with the town centre core but is '*Infill within the existing built envelope of the town, as defined by the CSO Town boundary*'.
5. The land is serviced, i.e. it is land that is '*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*'.

Sustainable and Compact Settlements, Guidelines for Planning Authorities *Draft for Consultation August 2023*:

Chapter 3 'Settlement, Place and Density' of the guidelines sets out policy and guidance in relation to the key growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density.

Wicklow Town can be regarded as a Large Town. The land in questions can be regarded as follows:

'Large Town Suburban/Urban Extension Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the built up area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Regional Growth Centres, Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at accessible urban locations (defined in Table 3.7).'

Densities for Residential Development are to be set out using the following steps:

'Step 1: Consideration of Proximity and Accessibility to Services

Planning authorities should encourage densities at or above the mid density range at the most accessible urban locations in each area and densities at the mid to lower end of the range at intermediate and / or peripheral locations. Definitions are provided in Table 3.7 below for the terms 'High Capacity Public Transport Node or Interchange' and for the terms 'Accessible', 'Intermediate' and 'Peripheral' urban location to allow for consistent application of the Guidelines.

These definitions are aligned to the definitions in Section 2.4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities last issued in 2022. The characteristics detailed in Table 3.7 are not exhaustive and a local assessment will be required.'

Intermediate Urban Location Lands are defined as:

'Intermediate Urban Location Lands within 800 - 1,000 metres (i.e. 10–12 minute walk) of a principal town or suburban centre or a significant employment location(s) that may include a large hospital or third level institution;'

Step 2: Considerations of Local Character and Amenity

While considerations of location and accessibility will have a significant bearing on density, it is also necessary to ensure that the quantum and scale of a development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity or the natural environment.'

Statement on compliance with Sustainable and Compact Settlements, Guidelines for Planning Authorities (Draft 2023):

The zoning of the land for residential development would be in compliance with the Draft Guidelines for Sustainable and Compact Settlements as follows:

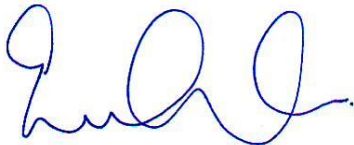
The land should be regarded as Intermediate Urban Location lands as it is located within 1,000m of the centre of a principal town.

Zoning of the land for residential development would be consistent with the guidelines for Sustainable and Compact Settlements.

We trust the above items will be considered by the Planning Authority and we request that the land be zoned for Residential Development in the drafting of the new Local Area Plan.

In the meantime if your department has any questions regarding any of the above please do not hesitate to contact the undersigned.

Yours Sincerely,

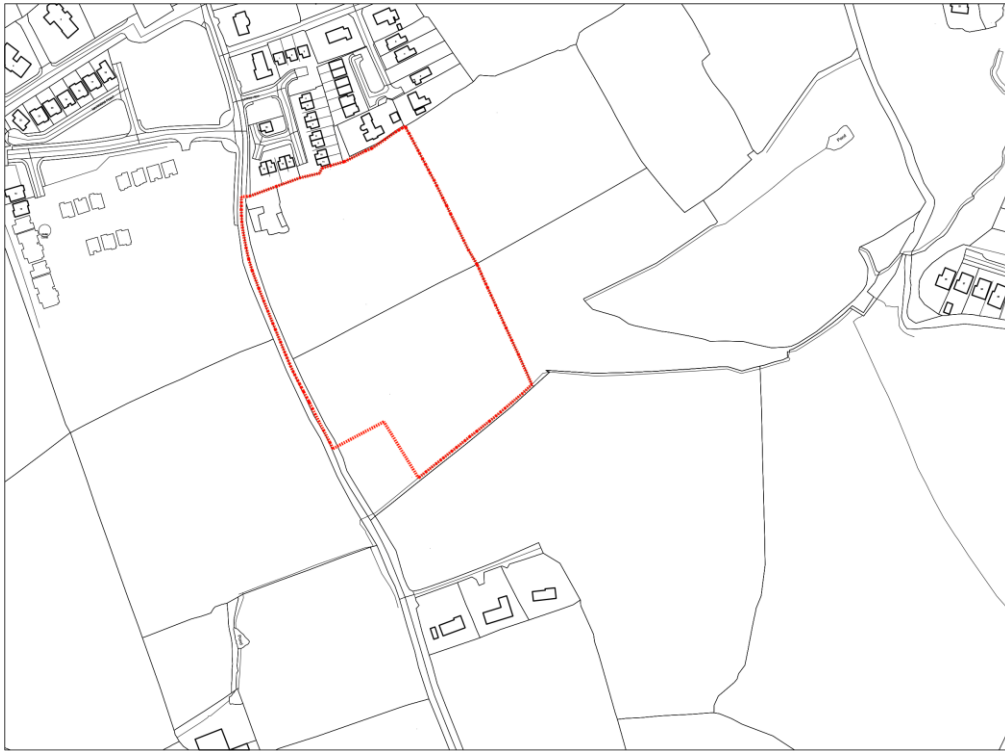
A handwritten signature in blue ink, appearing to read 'Eoin J. Carroll', written in a cursive style.

Eoin J. Carroll MRIAI

For Eoin J. Carroll Architects

cc. Ronan O’Caoimh

Appendix A: Site Location Map (OSI Map)



Description: Digital Landscape Model (GLM)
 Publisher / Source: Ordnance Survey Ireland (OSI)
 Data Source / Reference: HNS2
 File Format: Autodesk AutoCAD (DWG, DXF)
 File Name: ...
 Obj. Extent / Area of Interest (AOI): ...
 UTM Zone: 28QUG
 Projection / Spatial Reference: ...
 Centre Point Coordinates: ...
 Reference Datum: ...
 Map Series / Map Sheets: ...
 Data Extraction Date: ...
 Source Data Release: ...
 Product Version: ...
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