



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Lusra Teo
Reference:	DWTRLAP-182907
Submission Made	November 20, 2024 6:30 PM

Topic

Overall Vision and Strategy of LAP

Submission

Please see submission attached.

Topic

Economic Development

Submission

Please see submission attached.

Topic

Land Use Zoning Map

Submission

Please see submission attached.

File

Lusra Teo - Ballynabarny Submission.pdf, 0.89MB

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

20th November 2024

**Re: Submission to the Draft Wicklow Town – Rathnew Local Area Plan 2025
Lands at Ballynabarny, Co. Wicklow**

Dear Sir/Madam,

On behalf of Lusra Teo, Marlton House, Marlton Road, Wicklow Town owners of lands at Ballynabarny, we wish to make a submission in respect of the Draft Wicklow Town – Rathnew Local Area Plan 2025 (WRLAP).

The lands subject of this submission are outlined in Red on Figure 1 below and comprise an area of c.6.8ha. However, these lands do not represent the entirety of the Lusra Teo ownership of lands within the Wicklow-Rathnew area to be covered by the next WRLAP. Lusra Teo have been very active developers of Residential and Employment lands and associated infrastructure within the plan area for many decades and have made a significant contribution to the sustainable development of Wicklow and Rathnew including eight units in Charvey Court, Rathnew, the Village Mill Enterprise Centre, Ballybeg, Rathnew providing significant employment and Planning permission granted for an additional, similar, however significantly larger enterprise centre in January 2024 for 42 additional units at Ballinabarny (Ref. 22/1269), requiring an additional length of public footpath be constructed on the east side of the R772 and development contributions of c.€1.5m. This development will abut the proposed lands identified in this submission.

A separate submission has been made by Lusra Teo in respect of lands at Marlton.

Site Location and Description

The lands are located in proximity of the Ballinabarny roundabout just off the M11 and to the east of the R772 (old N11). The lands are located to the south of existing employment lands, which the landowners received a 10-year permission for development of an Enterprise Park comprising a total of 42 industrial/warehouse/distribution units in 2024 (Ref. 22/1269).

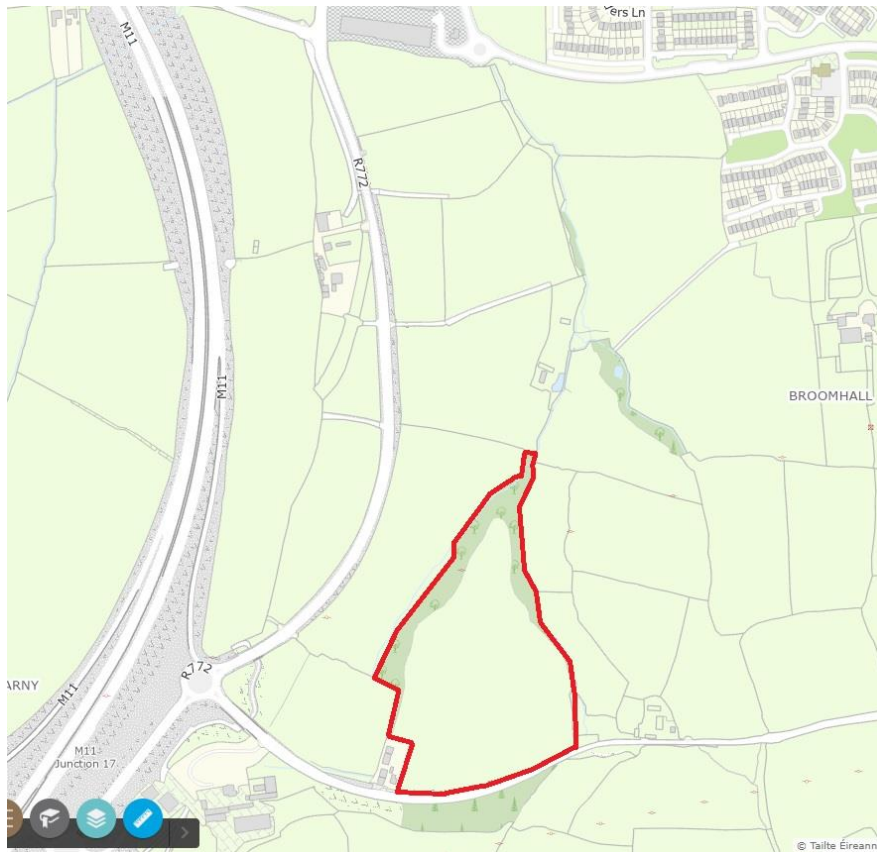


Figure 1 Lusra Lands Outlined in Red

Wicklow Rathnew Development Plan 2013-2019

As shown in the extract below, the subject lands were included in the Strategic Land Bank area of the WRDP 2013-2019. No explanation for the removal of the Strategic Land Bank or the adjustment of the LAP boundary to exclude these lands from the Draft WRLAP has been provided within the Vision and Solution set out in the draft LAP. The draft WRLAP does not appear to have any longer-term perspective to cater for employment expansion in the E-E context despite this expansion being a core vision in the WCDP.

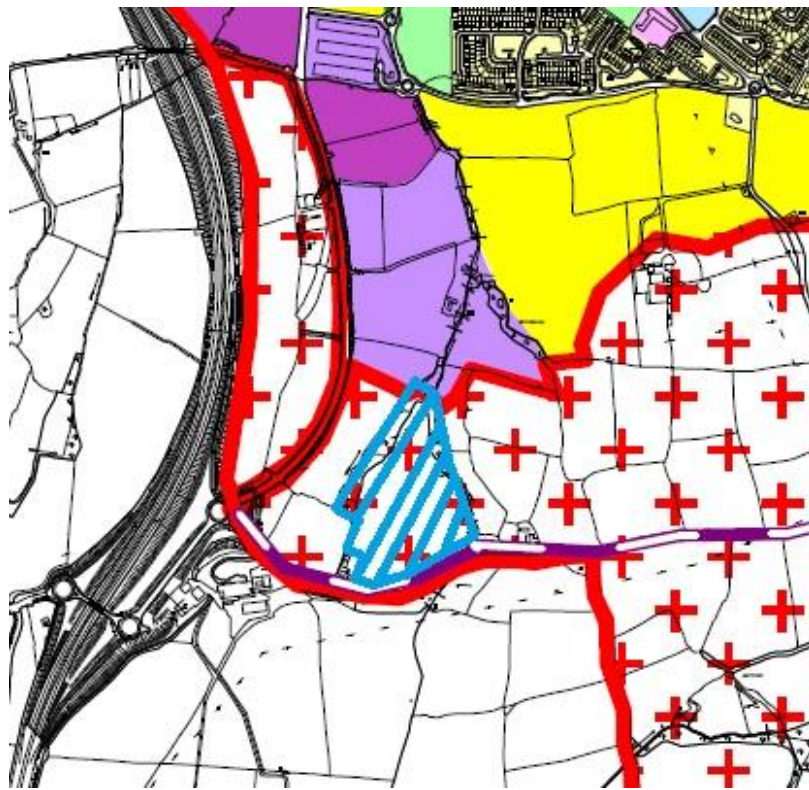


Figure 2 Indicative Outline of Lands Hatched Blue on 2013-2019 LAP Zoning Map

SLB	<p>Strategic Land Bank: To provide a land bank for future development of the settlement after the lifetime of this plan.</p>	<p>These are lands that are identified as being within the potential built envelope of the settlement with regard to proximity and accessibility to infrastructure.</p> <p>However, these lands are not suitable or necessary for development during the lifetime of this plan and may only be considered for detailed zoning and development after 2019.</p>
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Although the lands were not specifically zoned in the previous LAP, it is requested that they be included within the LAP boundary and zoned for Employment.

Wicklow County Development Plan 2022-2028

The Wicklow County Development Plan 2022 – 2028 (WCDP) provides a context for development in Wicklow/Rathnew that takes into account the National Planning Framework (NPF) and the Eastern Assembly Regional Spatial and Economic Strategy (RSES) and sets out the hierarchy position, role and function of this urban area in a regional and county context.

Wicklow and Rathnew are Level 2 ‘Key Town’ settlements in the Core Region of the Eastern and Midlands Regional Spatial and Economic Strategy (RSES) of Ireland and they are targeted for a high level of growth.

Table 3.3 Wicklow Settlement Hierarchy

Level	Settlement Typology	Description	Settlement
1	Metropolitan Area	Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Bray
	Key Town		
2	Core Region	Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Wicklow - Rathnew
	Key Town		

Wicklow is also recognised as the County town, providing important administrative and local government functions. The town is strategically located on the M/N11 and south-eastern rail corridor, at the centre point of the coastal area of the County. It is an economically active town that provides higher order services and facilities for the residents of the town and its catchment. Settlements within the catchment of Wicklow Town include Rathnew, Ashford, Glenealy, Roundwood, Rathdrum and a significant rural population. Within the settlement, Rathnew has a distinct identity and functions as a local service centre for its local community.

Wicklow-Rathnew is a major employment hub in the County, with a strong employment base attracting inflows of workers from around the County. The largest sectors in the settlement are commerce, manufacturing and education / health / public administration. The County town provides tertiary educational facilities at the Wicklow County Campus at Rathnew (in conjunction with Carlow IT – now SETU) and higher order health facilities at Knockrobin Primary Health Centre.

Regional Policy Objectives : Wicklow – Rathnew Key Town	
RPO 4.54	Support an enhanced role and function of Wicklow-Rathnew as the County Town, particularly as a hub for employment, training and education.
RPO 4.55	Support Wicklow-Rathnew's role in the provision of third level education at the Wicklow County Campus Rathnew (in association with Institute of Technology Carlow) and in particular, to support the development of the campus as a hub for the Film Industry and Screen Content Creation Sector.
RPO 4.56	Support enhancement and expansion of Wicklow Port and Harbour, to expand commercial berthing and pleasure craft capacity subject to a feasibility study with particular focus on avoiding adverse impacts on the integrity of adjacent European Sites.
RPO 4.57	Support the development of Wicklow-Rathnew as a tourism hub having regard to its accessibility to key tourist destinations in the Region.
RPO 4.58	To support ongoing investment in rail infrastructure to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity.

Chapter 9 of the WCDP deals with Economic Development and brings the context for job creation on zoned land in key towns up to date, including the following: -

The Council commissioned the County Wicklow Commuter Study in 2019. The survey carried out as part of the study revealed that 70% of commuters who work outside County Wicklow indicated that they would be likely or very likely to consider switching to a job in County Wicklow if one were available and 33% said that they would be likely or very likely to consider a lower salary if it meant they could work in County Wicklow. Census 2016 was the first census for which data on the 'daytime population' of areas was published. The daytime population includes everybody who indicated they worked or studied in the area, along with persons in that area who do not work or study (and so are there during the day). Wicklow's daytime population was 123,125 persons which was significantly lower than the nighttime population of 142,425.

This data may assist in identifying locations where existing high levels of daytime employment should be supported and enhanced, as well as locations where the focus should be the development of new employment opportunities, linked to the overall Core Strategy. By undertaking an analysis of the Census 2016 database it is possible to develop a profile of both the number of resident workers and the actual number of local jobs (known location and excludes mobile workers and blank destinations) in all areas. The NPF and EMRA RSES used this approach to identify the ratio of resident workers to local jobs. According to Census 2016, there are 58,247 resident workers in County Wicklow relative to 32,551 jobs. This gives a ratio of 0.55. This compares very positively with the 2011 ratio which was 0.42. However, it is still below the regional average which is 0.63. In accordance with national and regional policy to

create self-sustaining settlements and improve quality of life, it is the aim of Council to increase the jobs ratio to 0.7 by 2031. The RSES notes that a ratio of 0.7 plus indicates a strong economic function.

Economic Development Hierarchy

To combat leakage of jobs and talent - *In this regard this plan must place an emphasis on creating the right environment within each of these settlements to ensure that they are capable of attracting potential employers to appropriately zoned lands and thus increase employment within the County. The local plans crafted for these settlements shall address these challenges in a targeted manner* - with a focus on ‘people’ and ‘product’ intensive industries.

The following relevant objectives have been noted: -

9.5 Objectives for Economic Development

General

- CPO 9.1** To support all forms of employment creation, especially where this can mitigate long distance commuting, subject to the proper planning and sustainable development of the area and compliance with all other objectives of this plan. Strategic employment development will be directed into the towns of Bray, Wicklow-Rathnew, Arklow, Greystones and Blessington.
- CPO 9.6** To promote the development of employment generating uses at locations which comply with sustainable transportation objectives i.e.
- promoting the development of ‘product’ intensive industries (typically manufacturing and logistics based uses) at locations that are accessible to strategic roads infrastructure;
 - promoting the development of ‘people’ intensive industries (typically office, services and start-up entrepreneur based uses) at locations that are accessible by public transport networks and substantial residential areas, served by cycle networks and walking routes;
 - promoting the intensification of existing employment land uses that are in proximity to good public transport facilities; and
 - where appropriate, promoting the integration of employment uses with other land uses, including residential, tourism and retail uses, in an effort to provide mixed use developments, which can reduce the need to travel.
- CPO 9.8** To promote and facilitate the development of employment generating uses that maximise Wicklow’s locational strengths along the east coast ‘strategic transport corridor’ and the potential of the ‘Leinster Outer Orbital Route’.

CPO 9.14 To require employment based developments to be of the highest standard of architectural design and layout and comply with the Development & Design Standards set out in this plan.

CPO 9.23 To encourage and facilitate the development of small to medium scale indigenous industries and services at appropriate locations within all Level 1-8 settlements. The Council will require the provision of incubator/starter units in all major planning applications on employment zoned land.

The Council acknowledges that the development of small scale projects with long term employment potential are important in sustaining both urban and rural settlements in County Wicklow and as such, the Council will adopt a proactive and flexible approach in dealing with applications on a case-by-case basis.

Socio-Economic Profile 2015 (SEP)

Also reviewed is the 2015 Wicklow Socio-Economic Profile (SEP) report, which provides valuable information on the pattern and profile of enterprise developments in this urban area.

Information on employment and commuting into and out of Wicklow/Rathnew can be derived from the information contained in the SEP prepared on behalf of Wicklow County Council by Future Analytics in 2015, based on analysis of empirical census survey information.



The SEP provided a profile of the Wicklow/Rathnew urban area, noting the primary employment activities and commuting patterns and set out strategic objectives for enhancing the SEP in this linked settlement. While, as expected, there is considerable outward commuting

from the settlement to work, there is also considerable inward commuting to work locations in the settlement.

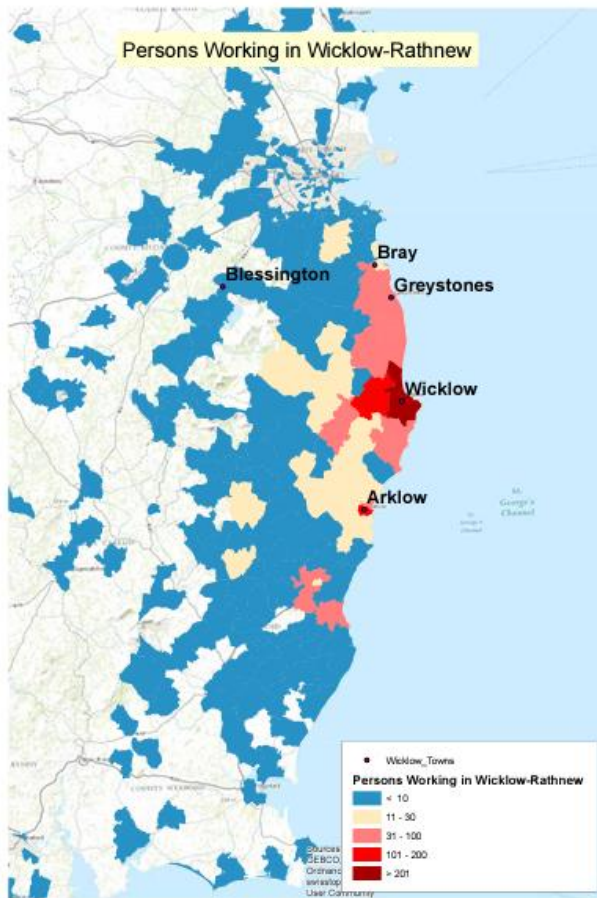
3.7.2.4 Employment Profile

Table 3-15 presents the numbers of people working in various industrial sectors within Wicklow-Rathnew, as categorised by the Central Statistics Office, Census 2011.

Table 3-15 Residents of Wicklow-Rathnew Working by industrial Group

Industrial Group	Total	% of Total
Manufacturing, mining and quarrying, Electricity, Gas,	451	12%
Construction	75	2%
Wholesale, Retail Trade, Transportation and Storage,	1,088	28%
Information and Communication, Financial, Real Estate,	803	21%
Public Administration and Defence; Compulsory Social Security	352	9%
Education, Human Health and Social Work Activities	842	22%
Other Service Activities	191	5%
Grand Total	3,866	100%

Table 3-15 shows that the highest number of Wicklow-Rathnew residents (28%) employed are working in Wholesale, Retail Trade, Transportation and Storage, while 22% are working within the sectors of Education, Human Health and Social Work Activities and 21% in Information and Communication, Financial, Real Estate sectors.



Based on data derived from the CSO POWSCAR database, the following map presents the commuting patterns of people travelling to Wicklow-Rathnew for employment.

As determined from Figure 3-22, Wicklow-Rathnew serves as an important economic focus for a local catchment, with a high level of those working in Wicklow-Rathnew from the immediate surroundings.

Figure 3-22 Commuting Patterns of people travelling to Wicklow-Rathnew for employment

Strategic economic development objectives were set out for this settlement in the SEP, as follows: -

Strategic Objectives:

To promote the successful economic development and growth in employment of the town and environs by:

- Providing the infrastructure and zoned land necessary to attract inward investment and growth in indigenous industry;
- Supporting the development of new employment opportunities in the right locations in the plan area;
- Fostering entrepreneurial activity by promoting and supporting opportunities for training and education, and business start-up and incubator facilities;
- Supporting and facilitating to the highest degree possible (subject to environmental and other relevant planning considerations) all forms of employment generation;
- Exploitation and development of existing assets - regions, counties and towns are now in completion with each other to draw in new investment and employment creating opportunities. Wicklow town, Rathnew and their environs have many characteristics and assets which could act as a catalyst for major employment growth in the region. It is therefore the strategy of this plan to ensure that the appropriate framework and services are in place to allow these assets to be developed to their full employment potential.

Draft Wicklow Rathnew LAP 2025-2031

The draft WRLAP acknowledges that *‘while a land-use plan has no direct role in creating jobs or bringing new employers to the County, the plan can ensure that sufficient zoned land is available for employment uses and can set out objectives to facilitate this aim.’*

In relation to industrial and business parks the importance of supporting the further development of the industrial and business parks within the settlement as manufacturing and warehousing areas that provide employment for the settlement and county is noted.

Employment Objectives

WTR8	To facilitate and support all forms of employment creation on appropriately zoned land in Wicklow Town -Rathnew and to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets in order to stimulate further employment within the area.
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The subject lands are conveniently located for access to the M11 to the west and the urban areas of Rathnew and Wicklow to the north and east. To support all forms of employment on appropriately zoned land requires sufficient land to be zoned appropriately to accommodate expansion in the future with a medium-term perspective, at locations that have particular advantages and where opportunities arising from critical mass and previous success can be leveraged.

This is a location where employment infrastructure was strengthened in conjunction with developments by Lusra Teo and levies and infrastructure enhancements have been applied to further development. It is sensible that the area be strengthened in the WRLAP to enhance viability and to optimize the benefit of infrastructure already provided and permitted.

Submission

As noted above, it is requested that the lands identified in Figure 1 are included within the LAP boundary and zoned for Employment uses. The lands are well served by the existing road infrastructure and are located to the south of the existing Village Mill Enterprise Park and lands with a recent permission for 42 industrial/warehouse units, with conditions to improve infrastructure. The lands have the capacity to provide a natural expansion of the existing

employment uses and were earmarked for future development being designated within the Strategic Land Bank area of the WRDP 2013-2019.

There is demand for serviced employment sites on the edge of the Wicklow-Rathnew area due to the good road infrastructure already in place.

The proposed draft WRLAP provides an area of Open Space (OS) running southwards from the roundabout at Friars Hill Road (formerly known as Saunders Lane) and the Village Mill Enterprise Park, which ceases at the LAP boundary. Including the subject lands for employment uses within the LAP boundary to replace the OS and relocating the OS further south would allow a continuation of that area of Open Space further southwards, linking with Ashtown Lane along the southern boundary of the lands, which is due to be upgraded shortly.

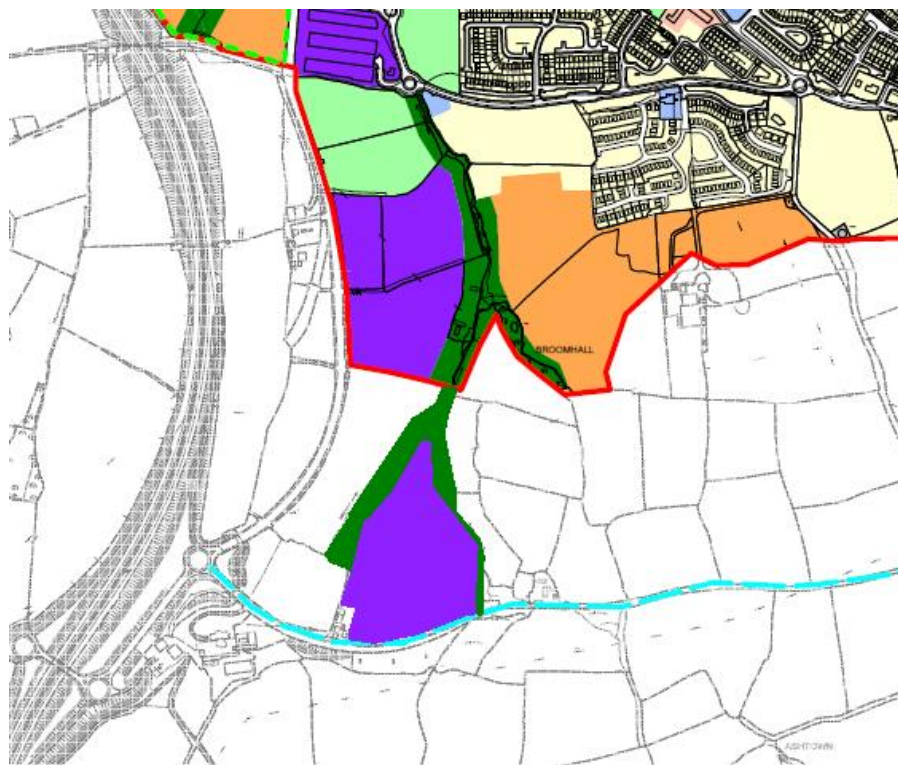


Figure 3 Draft Zoning Map with Request for Re-Zoning Illustrated

A separate submission for Lusra Teo lands located around the area of Marlton has been prepared and submitted by this office. As part of that submission an area of land proposed to be zoned for employment (c.6.61ha) is requested to be re-zoned for residential development. It is submitted that the land zoned for Employment in the Marlton area would be better located on the subject Lusra landholding at Ballynabarny, for reasons explained above, namely location,

existing infrastructure and accessibility to national infrastructure routes (for which the Motorway infrastructure is designed as per the Spatial Planning and National Roads Guidelines).¹

The subject lands have an area of c.6.8ha and the relocation of the lands zoned Employment from the proposed zoned allocation of c.6.6ha at Marlton would result in a similar quantum of overall lands zoned Employment within the LAP boundary.

If there is a concern that additional Employment lands would imbalance a carefully devised strategy, it should be noted that the Lusra Teo proposal is not necessarily seeking an increase in the amount of lands zoned for Employment in Wicklow-Rathnew, rather a redistribution of the location of Employment lands.

It is requested that this submission be taken into account in the preparation of the WRLAP in 2025. The landowners are willing to engage with the planning team should any issues require clarification during the preparation of the CE Report or in the preparation of the final plan.

Simon Clear

¹ Spatial planning and National Roads, Guidelines for Planning Authorities 2013, 1.3 Function of National Roads – 1.4 Strategic Traffic.