



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
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Reference:	DWTRLAP-221123
Submission Made	November 20, 2024 10:12 PM

File

Ashtown Lane Submission.pdf, 1.9MB

20th November 2024

Dear Wicklow County Council,

Please find attached a series of three submissions regarding the draft Wicklow-Rathnew Local Area Plan. I have provided this note to accompany the submissions because as you will see, the proposed LAP all but wipes out the development potential across virtually all my land in the area, but in particular three of my sites in Wicklow Town (as evidenced in the map I've attached to this letter). Over the last few weeks since the draft has been published, I continue to be struck by the peculiarity of the rezoning proposals for these three sites, particularly as we find ourselves collectively grappling with a housing crisis.

I have lived in County Wicklow for thirty years and have raised my four children here. I founded a biotechnology company which has employed over 500 people in Bray (Trinity Biotech and T-Coag), and now run a residential construction company here (Lowick Homes). I have always, and will always be, heavily invested in the development of the county.

Land in Question

In the Wicklow Town and Rathnew area, the total consideration for sites I've purchased is in excess of 50 million euro. My reasonable belief at the time of purchase, and my conviction since, has been the current and future potential of the town, and accordingly, the need for housing in the town.

Since those purchases, the sites under my ownership have gone from being fully zoned for residential housing, to then being reduced to Strategic Land Bank zoning under the last LAP, and now in the proposed LAP, they are effectively being thrown out of the development plan entirely with a total de-zoning. This de-zoning is proposed despite the fact that the three sites in question:

1. Are within the defined LAP development or CSO-defined town boundary, and are bordered by other developments or zoned land;
2. Have established connection points for services or indeed are already serviced; and
3. Are accessed via existing roads.

These shared characteristics are why I bought these sites in the first place. It is not unreasonable to expect lands with such compelling characteristics to retain their zoning or indeed improve over a twenty-year period, particularly during an enduring housing crisis. Instead, what has happened is a systematic de-zoning of these three sites in a series of decisions that not only seem bitterly unfair but are impossible to understand.

As an example, the 10 acres at Greenhill Road have essentially been carved out of the proposed LAP boundary to now create an odd-looking peninsula of un-zoned land (see bottom right of the attached map), despite the fact that that existing housing or zoned land borders the whole site, or that new footpaths to the Greenhill Road were only put in by WCC this year, and the fact that the land is fully serviced. It simply does not follow that this land has been removed from the equation. Similarly, the Dunbur Lower land wraps around the existing taken-in-charge Seacliff development and has ready to go services and access (there are even two hammerheads in the Seacliff development to facilitate this).

I have put together the below table to illustrate the severity and scale of de-zoning on the lands in question as you move left to right over the last twenty or so years.

	Zoning at Time of Purchase	Change to Zoning under 2013 - 2019 LAP	Change to Zoning under Proposed 2025 LAP	Change requested in this submission
60 Acres at Ashtown Lane Water – YES Sewage – YES Access – YES	Zoned Residential and Commercial	8 acres remained zoned as <i>Residential</i> , but remaining 50+ acres put into <i>Strategic Land Bank</i>	8 acres pushed to Residential Phase 2 (RN2) (we have a live planning application submitted for 58 houses on this site), whilst the majority of the remaining land has been removed from the development plan boundary and has no land use zoning	8 acres retains its RN1 zoning (instead of proposed RN2 zoning) Remaining land zoned as <i>Strategic Land Bank</i> and <i>Active Open Space</i> is examined and considered for a mix of <i>Residential</i> and <i>Active Open Space and other land uses</i>
10 Acres at Greenhill Road	Zoned Residential	Rezoned into	Entire 10 acres has been de-zoned for no-land use whatsoever	Reverse the draft proposal and provide

Water – YES Sewage – YES Access – YES		Strategic Land Bank		Residential Zoning (RN2) for the land
15 Acres at Dunbur Lower Water – YES Sewage – YES Access – YES	Zoned Residential	Rezoned into Strategic Land Bank	Entire 15 acres has been de-zoned for no-land use whatsoever	Reverse the draft proposal and provide Residential Zoning (RN2) for the land

Changes Requested to the Proposed LAP

When I consider the rezoning proposals under this draft LAP, the sites under my ownership have been disastrously impacted, without justification. Across the three sites referenced above, and indeed a fourth at Ballybeg, Rathnew where I am part of a partnership that owns 22 acres of land (also disastrously impacted under the draft proposals), I do not believe the urgent need for delivery of housing on sites that are ready to go, is being given enough weight.

As mentioned above, Lowick Homes is our construction company. Over the last 12 months, we’ve built 80 family homes at Littlebrook, Delgany, and the final 27 houses there are underway. At the former Convent lands in Delgany we are building 99 homes, and in Blessington we will begin 58 social housing units, and a further 14 apartments in Greystones in the new year. With a track record of delivering housing, if the sites in question were zoned for Residential (Priority 1), then we would deliver that housing immediately, as is our intention if the current live planning application for 58 houses at Ashtown Lane is granted.

Much has been made of the outdated population targets on which Wicklow Town’s housing targets are based, and it seems inexplicably short-sighted not to take the opportunity to include more residentially zoned land, when we know anecdotally and statistically that the current projections do not reflect the reality on the ground. Acknowledging that the pent up demand for housing will be the hallmark of housing policy until at least 2050, main streets up and down the country and within our county are prospering off the back of development and growing communities within town boundaries.

Committing to the de-zoning of land within a 10-minute walk of the town risks Wicklow Town missing this opportunity, and the economic and social benefits associated with a compact and vibrant community, whilst also delivering housing.

We cannot change the fact that we need more houses, we can only commit to meeting that need and under this proposed plan, we will fail in the duty to do so in the timeframe needed. As an individual, and as a builder who will build, I strongly feel the proposed zoning of these three sites is not only a missed opportunity, but an oversight that should be corrected as follows (briefly, but elaborated on in the attached submissions):

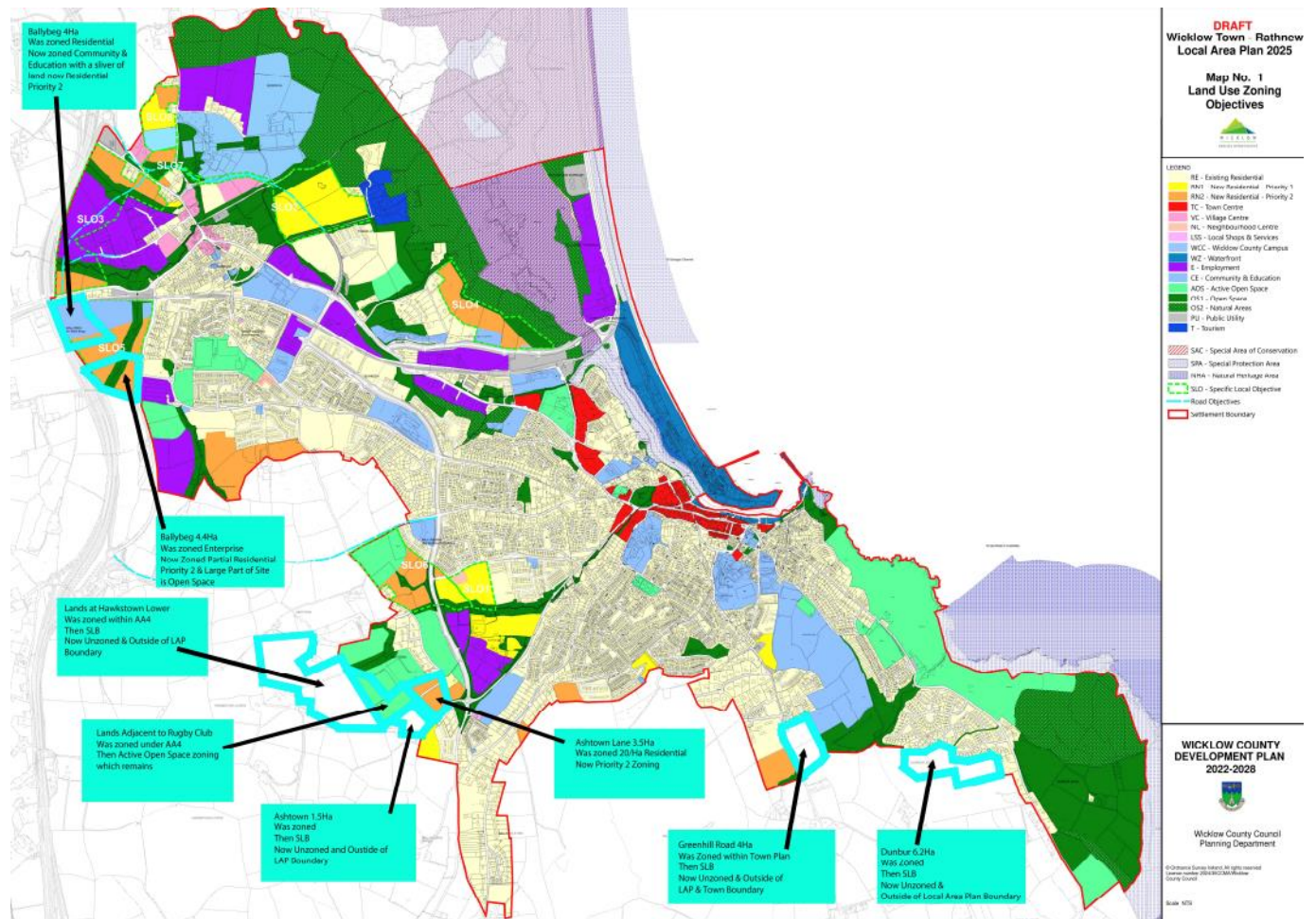
- Change 8 acres at Ashtown Lane from Residential (RN2) to Residential (RN1)
- Change Greenhill Road 10 acres to Residential RN2
- Change Dunbur Lower 15 acres to Residential RN2

I would welcome further discussion on the matter and am available to elaborate on any points made above or in the detail of the submissions within.

Yours sincerely,

Ronan O'Caoimh

Map Illustrating Change to Zoning Across Lands Under Draft LAP





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19.11.24

Uploaded Via Web-Portal:

RE: Draft Wicklow Town - Rathnew Local Area Plan 2025.

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

The land which is the subject of this submission 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.

Now, to our client’s great disappointment, the majority of the land in question is not only not zoned for residential development, it is removed entirely from the development plan boundary and now has no land use zoning whatsoever.

The part of the land that is currently zoned R3 in the existing LAP is proposed as RN2 land and will now be subject to phasing with development only possible if the majority of the residential development of the RN1 lands are executed.

The below extract from the Draft 2025 LAP zoning map indicates the location of the land.

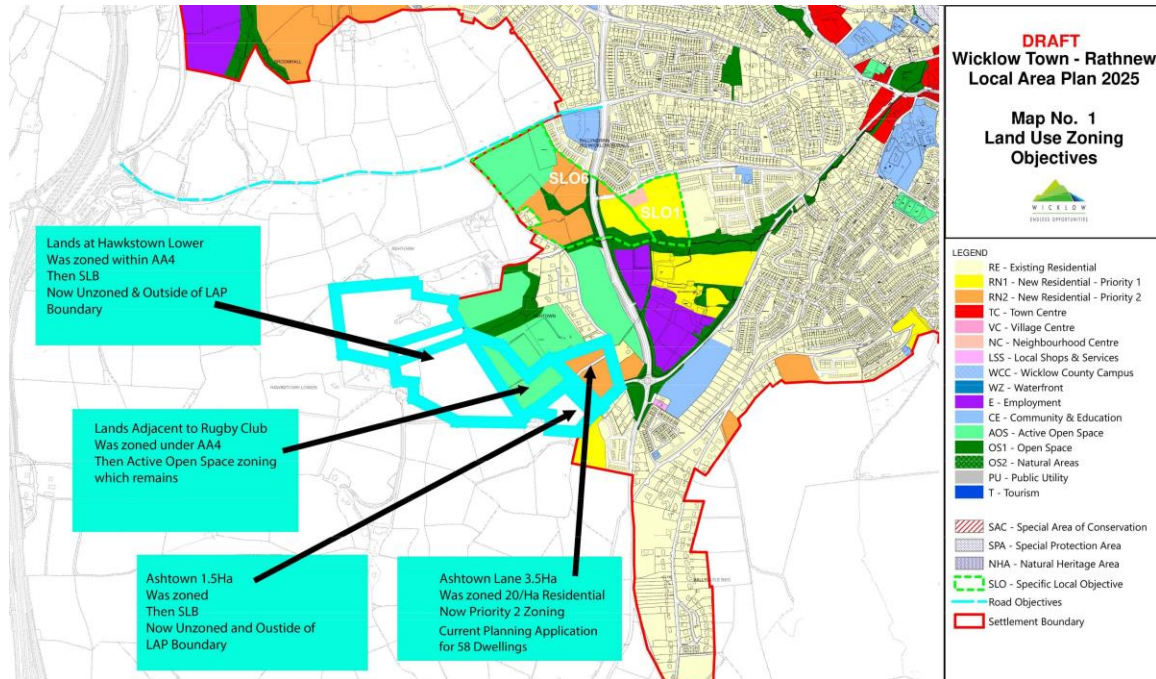


Fig. 1 Extract from Draft 2025 LAP Zoning Map (Land outlined in light blue line)

Our client request that the land be zoned RN1 for Residential Development in the 2025 Lap 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. Permission was initially refused in February 2022. Our client has spent the intervening period trying to address the reasons for refusal in a new planning application for residential development. This involved coming to agreements on access and layout with adjoining land owners and a new planning application for residential development has been submitted and is now running on the majority of the zoned land. The application includes neighbouring properties fronting on to Ashtown Lane. Our client is actively trying to establish permission for residential development on the land.
- The RN1/RN2 phasing of residential zoning proposed in the draft LAP is informed by outdated population targets in the Core Strategy of the County Development Plan. The draft LAP states that permission for RN2 lands will not

be considered if housing generated by any proposed development significantly breaches core strategy targets. The proposed development of the overall land, including the subject of the current planning application, would yield approximately 100 dwellings. Such an amount is not considered to significantly impact on Core Strategy targets.

- The population targets in the County Development Plan and the 2025 LAP are out of date and do not take account of the sizeable population growth that has occurred since the 2022 Census.
- 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 the build of 108 high-quality dwellings in Delgany, of which in excess of 70 have become occupied in the last 12 months. Lowick are also actively developing the former Convent Lands site, a 99-dwelling development, to be known as Holly Hill, Delgany, with the first units available for occupation in the first half of 2025. 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 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.

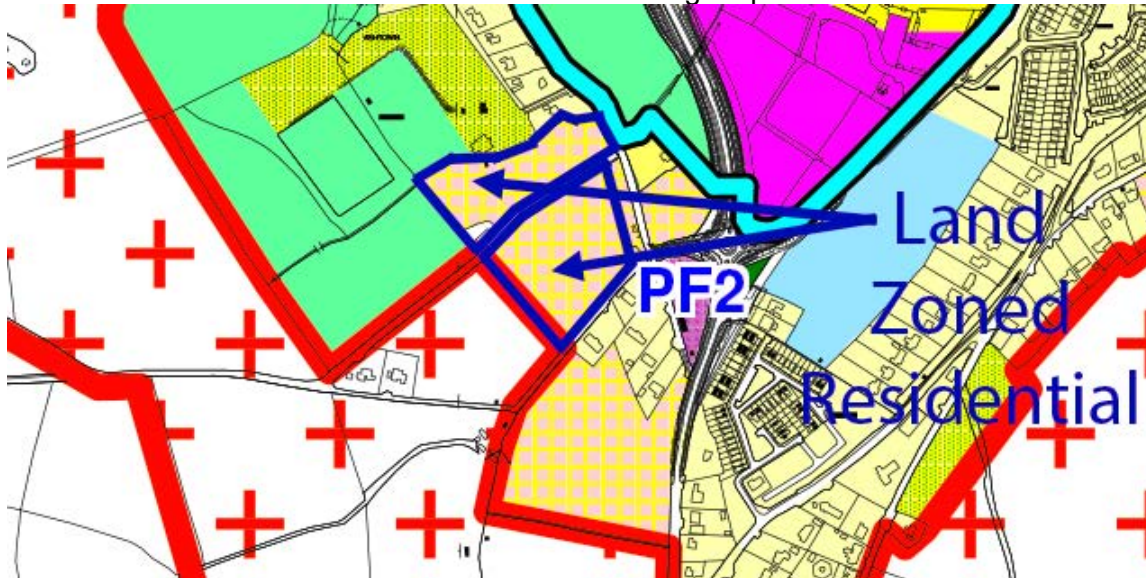


Fig. 2 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land with current residential zoning (outlined in blue line).

Our client requests that the land retain its zoning for Residential Development in the new Local Area Plan and is included in the RN1 lands for the following reasons:

- 1) The land is situated within the Development Plan Boundary.
- 2) There is a live current Planning Application for Residential Development on the land (File Ref: 2460688).
- 3) 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.
- 4) 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.
- 5) 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.
- 6) 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.
- 7) 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.
- 8) 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.
- 9) 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.
- 10) Outdated Population Targets.
Our client considers that the population targets as set out in the County Development Plan and the Draft Wicklow & Rathnew LAP are outdated and do not take account of the considerable population growth that has taken place since the Census of 2022.
We refer in particular to the statistics published on the CSO website (www.cso.ie) on the 27th of August 2024 as follows:

Population and Migration Estimates, April 2024

In the year to April 2024, the population of Ireland saw the largest 12-month increase since 2008

CSO statistical publication, 27 August 2024, 11am Online ISSN: 2009-5226.

Key Findings

In the 12 months to the end of April 2024:

- *The population in Ireland rose by 98,700 people which was the largest 12-month increase since 2008.*

Regional populations:

The proportion of the population residing in Dublin has risen from 27.6% of the total in 2011 to 28.5% of the total in 2024 and is now at 1,534,900 people, an increase of 33,400 since April 2023.

The Mid-East and South-West had the second and third highest population by region with 785,000 and 773,500 people respectively, or a 14.6% and 14.4% share of total population in April 2024. Counties of the Mid-East, South-West, and Dublin NUTS 3 regions (Dublin, Kildare, Meath, Wicklow, Louth, Cork and Kerry) together had a 57.5% share of the total population in April 2024, with just above three million people.

In April 2024, the region with the lowest contribution to the total population was the Midland region with 330,900 people (6.2%) followed by the Border (439,800 or 8.2%), South-East (474,800 or 8.8%), West (509,000 or 9.5%) and Mid-West (532,400 or 9.9%) regions.

The above population growth and future increased growth rate levels are not factored into the population targets in the County Development Plan or the Draft Wicklow Rathnew LAP.

It is noted that outside of Dublin the Mid-East region is the second largest growth area in the country since the 2022 census.

It is considered that the population targets in the plans are not robust enough to cater for future housing requirements and housing targets are too low considering the level of population growth that is occurring.

In the midst of a housing crisis would it not be prudent to take these growth rates into consideration and factor them into the new LAP. This would require an additional amount of land zoned for residential development in the LAP.

Our client considers that their land is ideally located to cater for this increased demand for future housing. We are of the opinion that it is not appropriate to phase the development of residentially zoned lands requiring that some areas are developed in advance of others. Should the Planning Authority consider that phasing is required our client requests that his land is included in the RN1 zoned lands in the 2025 LAP.

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.

We note that the remaining land in our client's ownership was zoned for Active Open Space (AOS) and 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).

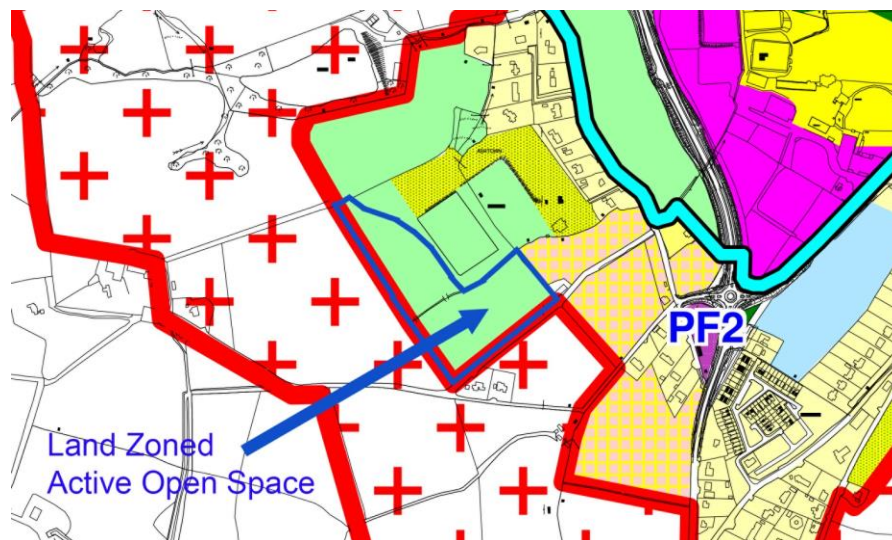


Fig. 3 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land with current Active Open Space zoning (outlined in blue line).

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.

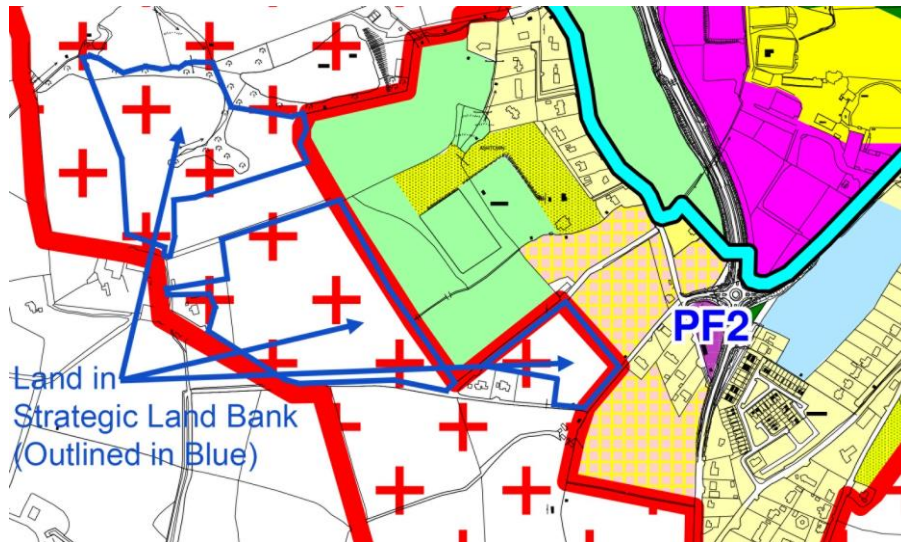


Fig. 4 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land in the Strategic Land Bank (outlined in blue line).

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.

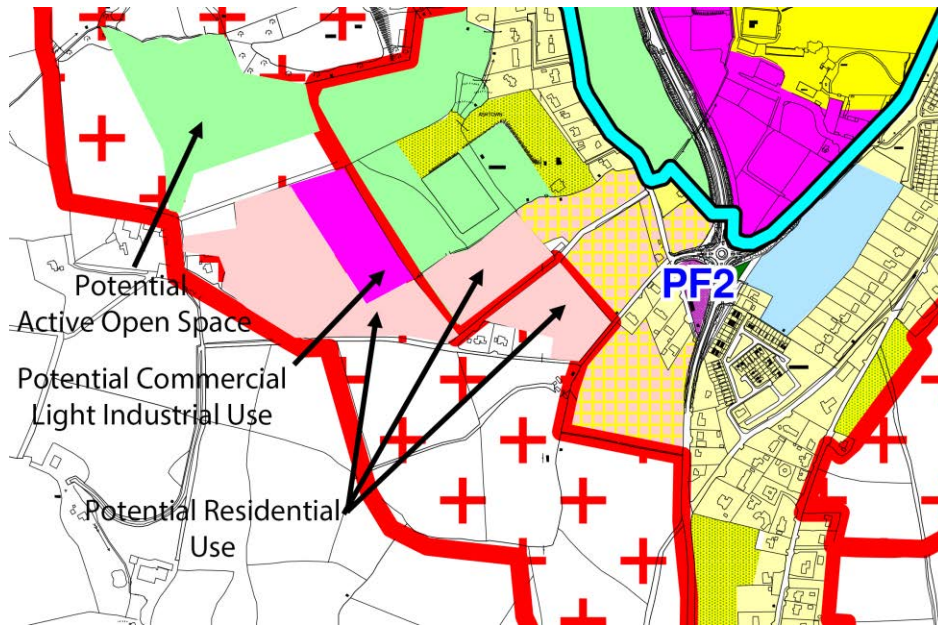


Fig. 5 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating potential land use zoning for land currently with the Strategic Land Bank.

We trust the above items will be considered by the Planning Authority and we request that where we have highlighted it is requested that the land be zoned for Residential Development in the drafting of the new Local Area Plan and included in the RN1 phase one lands.

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)

