



Wicklow Town - Rathnew LAP Submission - Report

Who are you:	Agent
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Reference:	WRLAP-111944
Submission Made	September 28, 2023 11:24 AM

Topic

Compact Growth - Housing - Population Growth

Submission

See attached submission.

Map



Site Description:

Lands south of Village Mill Enterprise Park, Friars Hill, Rathnew, Co. Wicklow

File

Rathnew LAP - Submission Final.pdf, 2.24MB

Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Thursday, 28th September 2023

Dear Sir/Madam

**RE: PRE-DRAFT CONSULTATION WICKLOW TOWN - RATHNEW LOCAL AREA PLAN 2024:
SUBMISSION IN RESPECT OF LANDS AT FRIARS HILL, RATHNEW, CO. WICKLOW**

1.0 INTRODUCTION

Cyril McGuire of VC Land Investments Limited¹ has retained Tom Phillips + Associates, Town Planning Consultants², to make this submission to the *Pre-draft Wicklow Town - Rathnew Local Area Plan 2024* (Issues Papers), which was published on 19th July 2023. This submission is made before the consultation period closes on Thursday, 28th September 2023.

Our client is the owner of a site which is located south of the Village Mill Enterprise Park, off Friars Hill, Rathnew, Co. Wicklow. The site is located in the south-west portion of Rathnew, at the edge of the village in an area which is currently evolving to provide new residential development.

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Figure 1.0: Location of our client's lands (indicated by yellow star) in the context of the Local Area Plan boundary. (Source: MyPlan.ie, as annotated by Tom Phillips + Associates, 2023.)

1.1 Executive Summary

This submission has regard to the recently published Issues Papers for the *Wicklow Town – Rathnew Local Area Plan 2024*, which outlines the need for c. 1,500 new homes within the Development Plan boundary. The Issues Papers identify that 70% of new homes are to be located outside of the existing built-up areas. We highlight that the remaining quantum of land which is currently zoned for residential use is likely insufficient to meet this housing requirement, therefore additional land will be required to be zoned for residential development as part of the forthcoming plan.

The south-west portion of Rathnew is currently undergoing a period of change, whereby lands which were previously in use for agriculture are being developed for residential use. Our client's lands form a natural extension of this new residential area and therefore we would ask Wicklow County Council to consider locating the necessary additional residentially zoned land within this area of Rathnew.

2.0 SITE CONTEXT

2.1 Subject Site and Urban Context

The subject site measures c. 4.1 Ha and is located in the Broomhall area of Rathnew, Co. Wicklow. The site is currently used for agricultural purposes. The site is bound to the north by the Village Mill Enterprise Park, to the south by agricultural lands, to the west by the R772 and agricultural land, and to the east by a residential development which is currently under construction.

The surrounding character to the south and west of the subject site is primarily agricultural. The surrounding character to the north and east of the subject site is primarily residential. The Broomhall area is currently undergoing a period of significant change, with a number of new residential developments being constructed, particularly those sites located south of Friars Hill. The subject site forms the end of a linear pattern of residential development within this area.

This part of Rathnew is characterised by a wide range of services and amenities that reflect the rapidly emerging residential nature of the area. This includes St. Coen's National School, Gaelscoil Chill Mhantáin, and Coláiste Chill Mhantain, which are the primary and secondary schools serving the local community. The Merrymeeting Shopping Centre provides for the retail and healthcare needs of the local community, including a convenience store, post office, pharmacy, and GP clinic. Rathnew GAA club is located centrally within this residential area, which features a number of playing pitches and training areas. Rathnew AFC also operate from this location.

The Broomhall area is well connected to both Rathnew and Wicklow Town and has easy access to the M11 via exit 17. The M11 provides links northbound to Dublin and southbound to Wexford.



Figure 2.0: Location of our client's lands outlined in red (Source: Google Maps, as annotated by Tom Phillips + Associates, 2023.)

2.2 Planning History

There have been 2 no. previous planning applications lodged for the subject lands, in the ownership of our client. Application Reg. Ref. 072333 was lodged on 2nd November 2007 and sought the provision of an innovation, business, and enterprise park, comprised of warehousing, offices, retail, and creche uses. The development would provide 24,062 sqm gross floor area, with buildings ranging in height from 2 to 4 storeys. This application was granted permission by Wicklow County Council on 25th September 2008, and subsequently granted by An Bord Pleanála on 18th September 2009 on appeal (ABP. Ref. 27.231441).

An extension of duration (Reg. Ref. 41801) was lodged for application Reg. Ref. 072333 on 5th September 2014, citing that the application could not be implemented previously due to economic and commercial reasons. A 5 year extension of duration was granted on 16th October 2014, which brought the appropriate period to 16th December 2019. This extension of duration was never implemented and the appropriate period has now lapsed.

3.0 NATIONAL AND REGIONAL POLICY GUIDANCE

3.1 Project Ireland 2040 National Planning Framework (NPF)

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

Some of the key National Policy Objective's (NPO) included in the NPF in terms of the need for additional housing are as follows:

NPO 3a: *'Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.'*

NPO 3b: *'Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.'*

NPO 3c: *'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.'*

We can see these national policies reflected in the overarching aims of the Issues Papers for the forthcoming *Wicklow Town and Rathnew Local Area Plan 2024*.

3.2 Regional Spatial Economic Strategy (RSES) – Eastern and Midland Regional Assembly, 2019-2031

The purpose of the RSES is to support the implementation of *Project Ireland 2040* by providing a long-term strategic planning and economic framework for the development of the Regions. The *RSES* defines Wicklow-Rathnew as a key town, with a strategic location on the M/N11 and rail corridor. The following is noted in the RSES in relation to key towns:

"These towns have capacity and future growth potential to accommodate above average growth coupled with the requisite investment in employment creation, services, amenities and sustainable transport."

The RSES notes the following in relation to Rathnew:

"Rathnew has a distinct identity and functions as a local service centre for its local community."

4.0 WICKLOW TOWN – RATHNEW LOCAL AREA PLAN PRE-DRAFT PUBLIC CONSULTATION ISSUES PAPERS

The *Wicklow Town – Rathnew Local Area Plan Pre-Draft Public Consultation Issues Papers* were published on 19th July 2023.

With regard to residential development, the Issues Papers state that c. 1,500 new homes will be required within the Local Area Plan boundary between now and 2031. The Issues Papers outline that 30% of these new homes are to be in the existing built-up area and town/village centres, facilitating compact growth. Therefore, the other 70% are to be located outside of the existing built-up residential areas, which equates to a requirement for c. 1,050 new residential dwellings to be provided in the Plan area outside the existing built area.

The Issues Papers states that it is a requirement for Wicklow County Council to identify and reserve an appropriate amount of land in the best locations to achieve these targets. These homes are to be provided in a sustainable manner, with regard to established and sustainable settlement patterns.

5.0 PREVIOUS WICKLOW TOWN AND RATHNEW DEVELOPMENT PLANS

This Section will primarily review the *Wicklow Town – Rathnew Development Plan 2013-2019* (the 2013 Plan). The land use zoning map for this plan is shown in Figure 3.0 below. Our client's lands are currently zoned E2 – Enterprise and Employment (Warehousing).

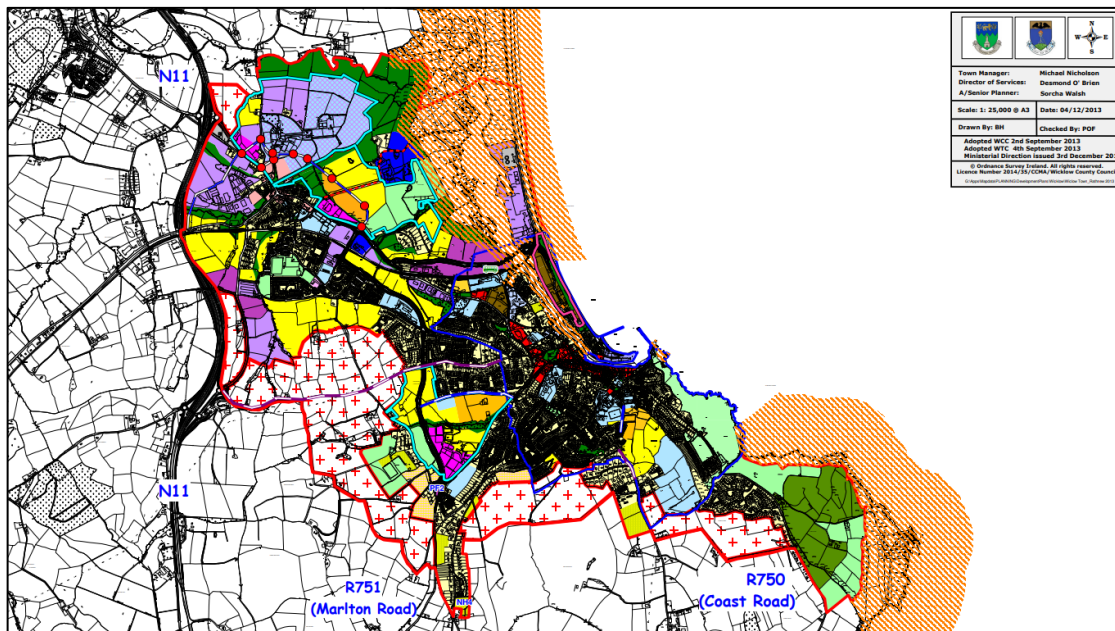


Figure 3.0: Land Use Zoning map for the *Wicklow Town – Rathnew Development Plan 2013-2019*. (Source: Wicklow County Council.)

The 2013 LAP was the first plan which created a joint strategy for Wicklow Town and Rathnew. Previously, both of these areas had their own individual plans: the *Wicklow Town Development Plan 2007-2013* and the *Wicklow Environs/Rathnew Local Area Plan 2008-2014*.

5.1 Residentially Zoned Land

We have prepared Figure 4.0, which highlights the land which was zoned for new residential development within both of these previous plans. Together, a large quantum of land was zoned for new residential development, primarily in the western portion of the joint plan boundary. However, as shown in Figure 5.0, the 2013 plan saw a major decrease in the quantum of land zoned for new residential development. This is likely due to a significant portion of the plan lands being placed in a 'Strategic Reserve', which effectively prevents development in these areas during the plan period.

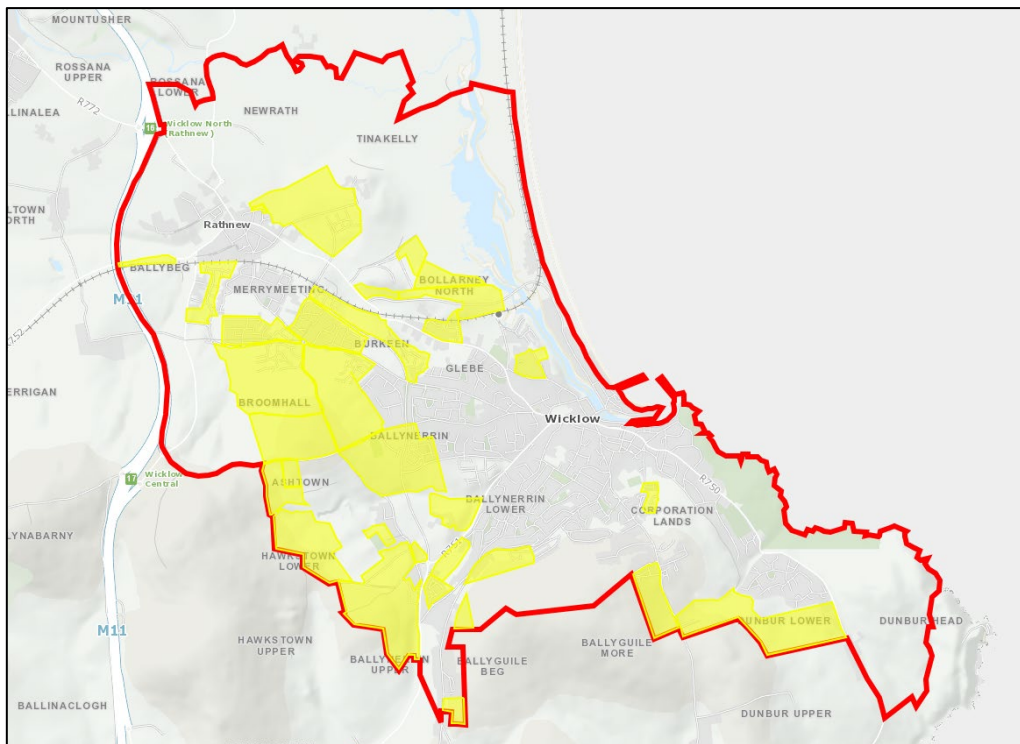


Figure 4.0: Lands zoned for new residential development within the *Wicklow Town Development Plan 2007-2013* and *Wicklow Environs/Rathnew Local Area Plan 2008-2014*. (Source: Wicklow County Council, as illustrated and mapped by Tom Phillips + Associates, 2023.)

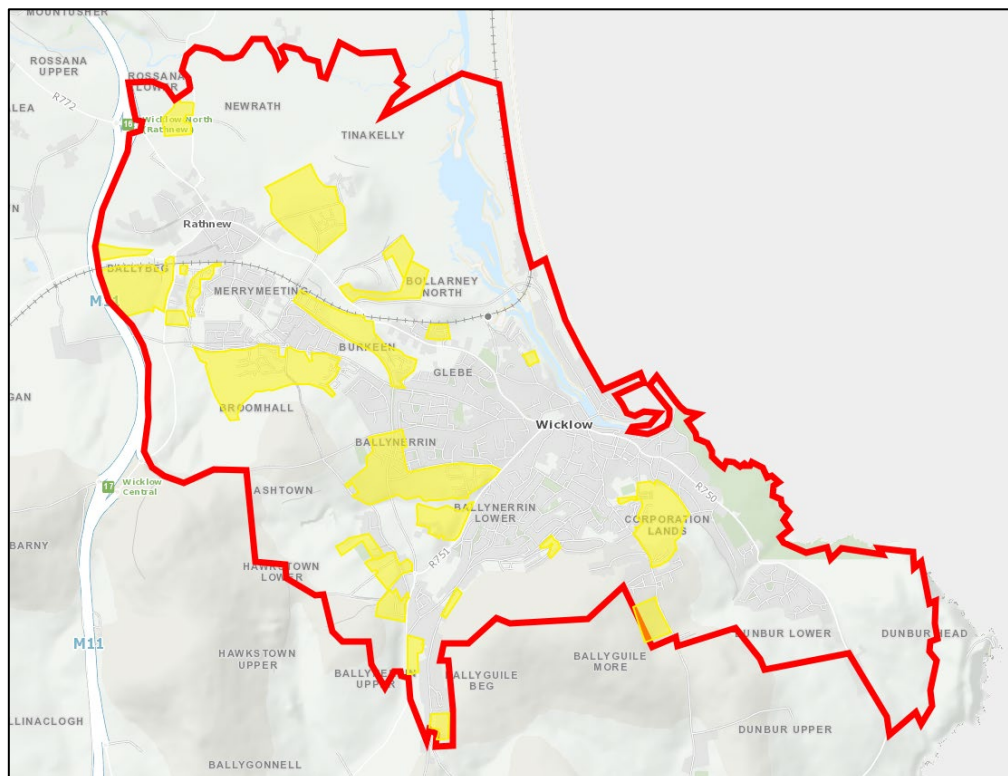


Figure 5.0: Lands zoned for new residential development within the *Wicklow Town – Rathnew Development Plan 2013-2019*. (Source: Wicklow County Council, as illustrated and mapped by Tom Phillips + Associates, 2023.)

Figures 6.0 and 7.0 show how the lands zoned for new residential development have evolved since the 2013 LAP was developed. We highlight that a large number of the sites which were zoned for residential development in this previous LAP have either been developed upon or are currently under construction, as indicated by the areas highlighted in green. In addition to this, there are a number of large sites which have received a Grant of Permission from Wicklow County Council for residential development, as indicated by the areas highlighted in blue.

The lands located immediately east of the subject site are currently under construction, providing 93 no. residential dwellings, as granted under Reg. Ref. 22/37. This is one of a number of new residential developments south of Friars Hill Road, including Waverly Meadow, Waverly Drive, and Sea Scape which have been constructed since the 2013 LAP was published. We highlight that Glenveagh Homes have live permissions (Reg. Refs. 211119 and 211187) for a 2 phase residential development on a suite south of Broomhall Court Road. This represents an evolving character for the area surrounding the subject site, which will soon be primarily residential, as opposed to the agricultural character, which was evident in 2013, when the previous LAP was produced. This also indicates that new residential development in Rathnew has been primarily located in the southern portion of the village.

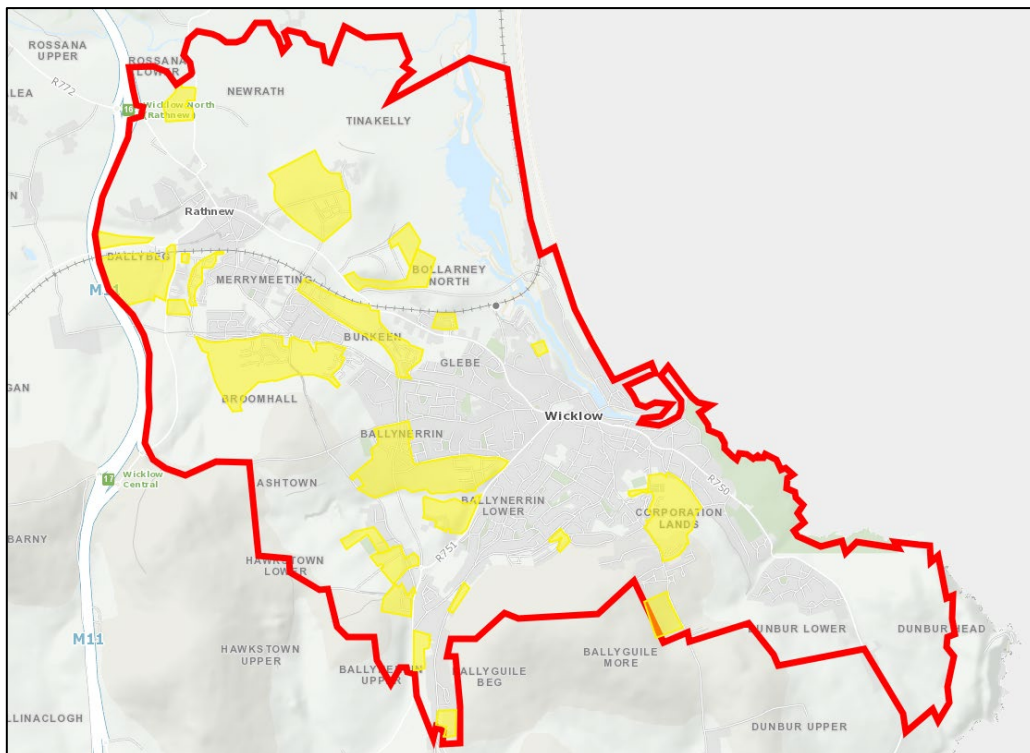


Figure 6.0: Lands zoned for new residential development within the *Wicklow Town – Rathnew Development Plan 2013-2019*. (Source: Wicklow County Council, as illustrated and mapped by Tom Phillips + Associates, 2023.)

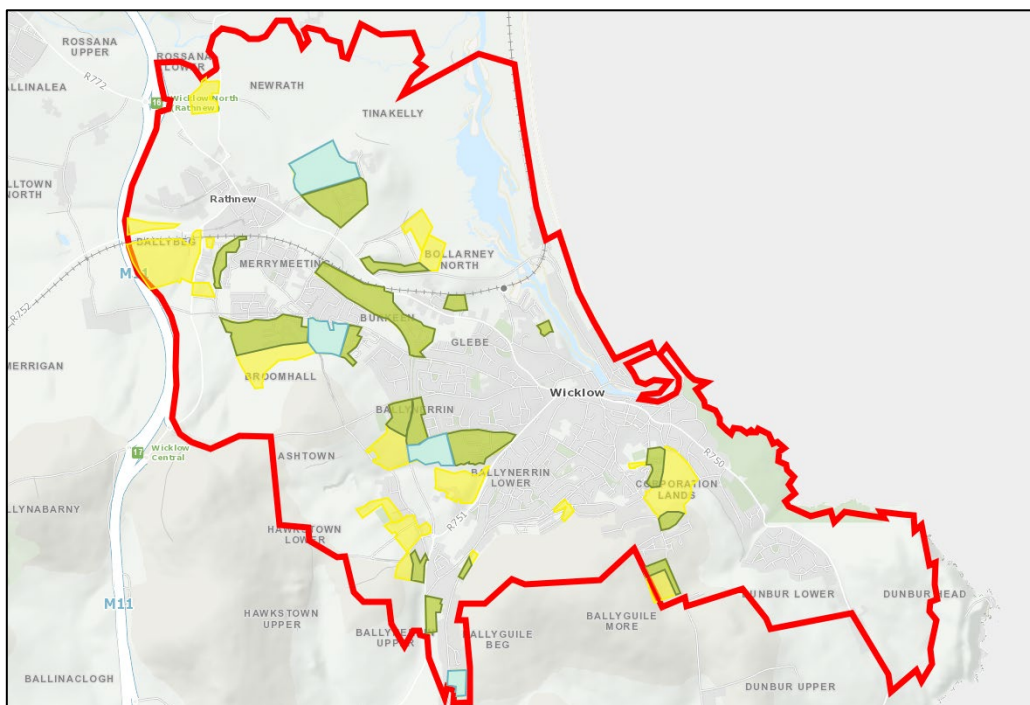


Figure 7.0: Status of lands zoned for new residential development within the *Wicklow Town – Rathnew Development Plan 2013-2019*. Areas highlighted in yellow indicate lands still available for development. Areas highlighted in green indicate lands which are developed/under construction. Areas highlighted in blue indicate lands for which have received a grant of permission, which is still live, to develop these lands. (Source: Wicklow County Council, as illustrated and mapped by Tom Phillips + Associates, 2023.)

Of those lands zoned for new residential in the 2013 plan which are still available for development, i.e. those highlighted in yellow in Figure 7.0, we have identified a number of potentially significant constraints to their future development for residential purposes. These are identified below and in Figure 8.0.

One of the largest areas of undeveloped land, which is zoned for residential development, is the site of An Tairsearch Organic Farm and Ecology Centre, which is operated by the Dominican Sisters, located west of Dunbur Park. A submission made by the Dominican Sisters as part of the Residentially Zoned Land Tax (RZLT) process in relation to these lands stated that the lands are in use as a farm, for charitable and educational purposes and that there is no intention to develop these lands for residential use. They also highlight the location of the Wicklow Rovers AFC Hockey Pitch within these residentially zoned lands.

Another large residentially zoned land parcel is that of the Marlton Equestrian Centre, located at Marlton Road. This site houses an established equestrian centre, with 3 no. outdoor arenas, two of which are floodlit, as well as a jump cross track. As this site is currently developed and a commercial business operates from this location, these lands would likely not be easily available for residential development.

An L-shaped portion of land within the Wicklow Rugby Club, Ashtown Lane, has been zoned for residential development. The rugby club has been operating from this site since the 1970s. The areas zoned for residential development at this location are identified in planning documentation (Reg. Ref. 23547) as training pitches. These training pitches have floodlights, with more floodlights currently proposed under Reg. Ref. 23547. The current planning application for floodlights associated with the existing training pitches at this location indicate that residential development is unlikely to take place at this location in the short-medium term.

We highlight a number of lands which are currently in use for agriculture, which have been zoned for residential development in the 2013 plan, such as those located south of the railway line, between the M11 and R772, and lands located east of Knockrobin Estate and north of the R999. A number of RZLT submissions were made in relation to these sites, which highlighted lack of access to services and roads, and established agricultural use as being reasons why residential development would not be suitable at these locations.

Additionally, we highlight two areas which are zoned for residential development which we understand to be in the ownership of Wicklow County Council: lands northeast of Hillview, and lands west of the R751.

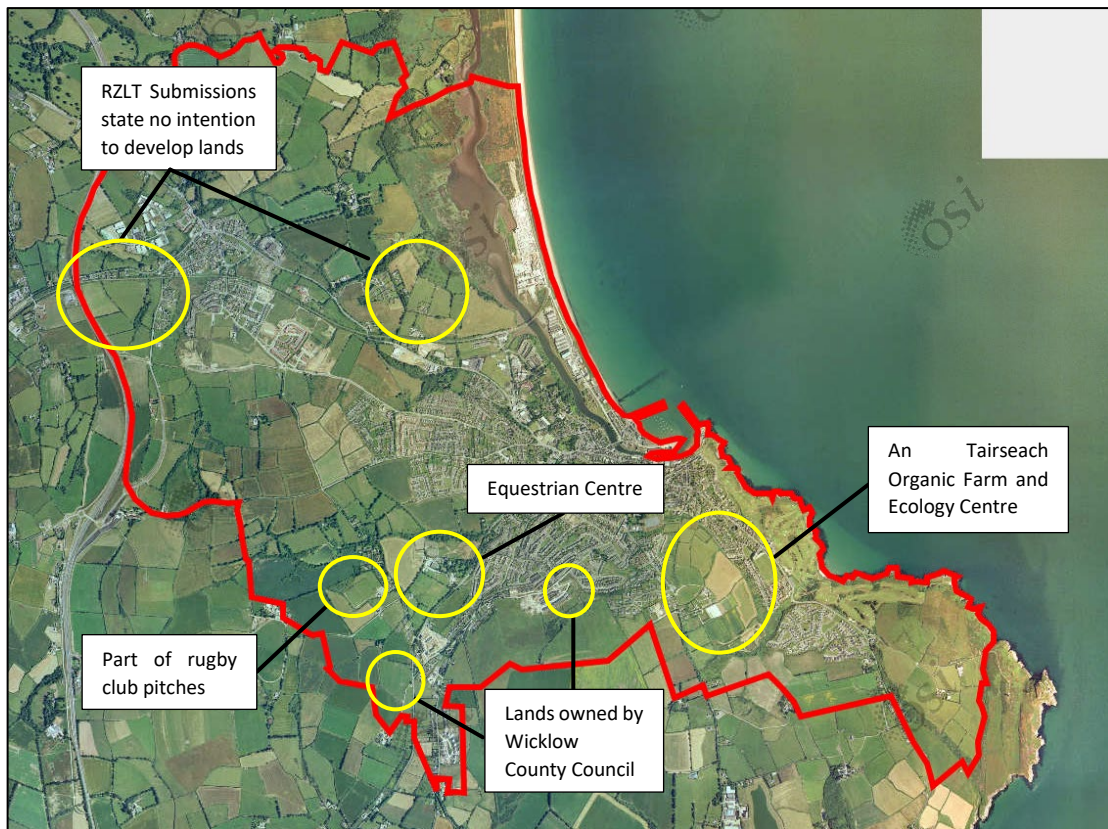


Figure 8.0: Potential development constraints for lands zoned for residential development within the Wicklow Town and Rathnew Development Plan 2013-2019. (Source: MyPlan.ie, as annotated by Tom Phillips + Associates, 2023.)

When comparing Figure 4.0, which shows the lands proposed for residential development in 2007/2008, and Figure 7.0, which shows the lands which are currently zoned for residential development and still available for development, we can identify that the majority of sites which are currently zoned and undeveloped, have been zoned for residential development since the 2007/2008 plans. Therefore, these sites have been zoned for residential development over multiple development plan cycles without development taking place. It is clear that these sites cannot be relied upon for to provide new residential accommodation in the short-medium term. These sites are highlighted in Figure 9.0 below.

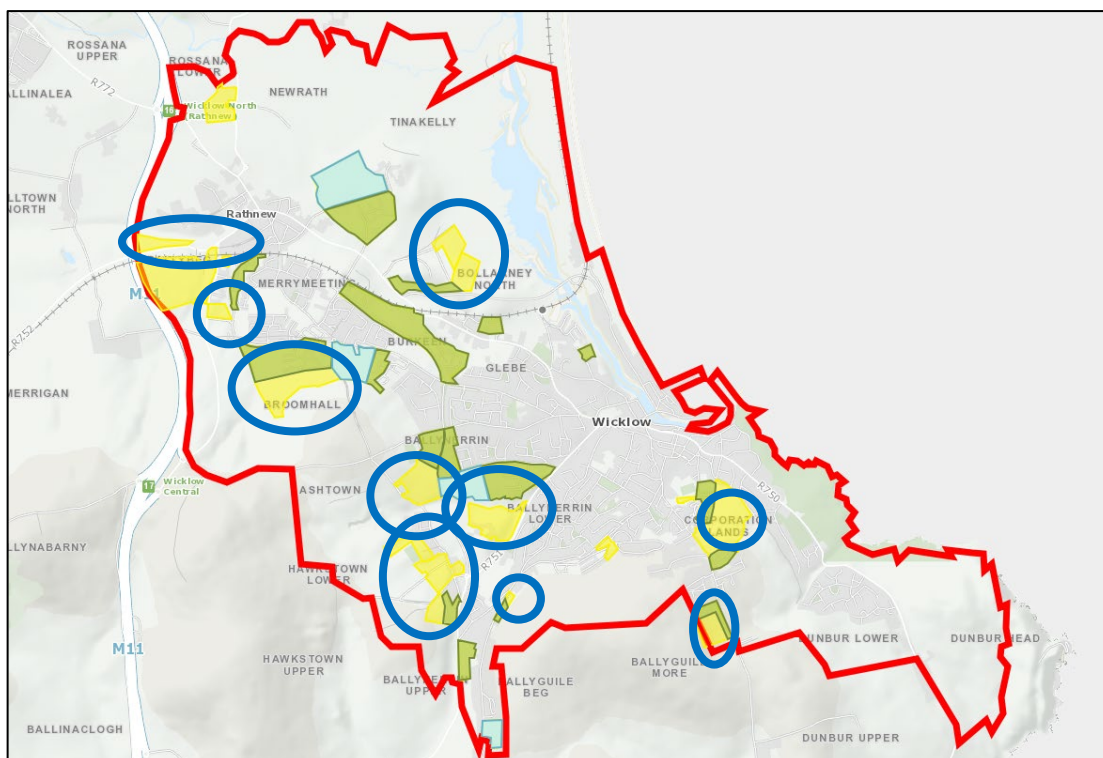


Figure 9.0: Map of the lands which have been zoned for residential development since 2007/2008 and are yet to be developed. (Source: Wicklow County Council, as illustrated and mapped by Tom Phillips + Associates, 2023.)

As outlined above, we contend that the remaining residential zoned land available for development within the Wicklow Town – Rathnew boundary has low potential to provide significant residential development in the short-medium term, due to established uses and development constraints. It is clear, therefore, that additional land will be required to be zoned for residential use as part of the new plan. The majority of successful residential development is located south of Rathnew, in the Broomhall area, which is now a well-established residential area with the requisite social infrastructure. There is an opportunity within this area to facilitate increased residential development, to aid in the delivery of the c. 1,050 houses required outside of the existing built-up areas, as outlined in the Issues Papers.

5.2 Enterprise and Employment Zoned Land

There are large areas of enterprise and employment zoned land within the 2013 LAP, including Rathnew Business Park and the proposed Clermont Campus. These areas are focused to the north and north-west of Rathnew village, in the north-west of the LAP boundary. This area is well connected, located adjacent to exit 16 on the M11. The majority of the lands zoned for enterprise and employment use are clustered in this area. However, as can be seen when comparing Figures 10.0 and 11.0 below, it appears that only a very small portion of these lands zoned for enterprise and employment use have been developed since the 2013 LAP was published. In our opinion, this location is far more likely to attract significant new viable commercial development as a result of the clustering effect and is more accessible than the commercially zoned lands to the south-west, which are essentially located within a residential area. This is not the appropriate location for new commercial development.

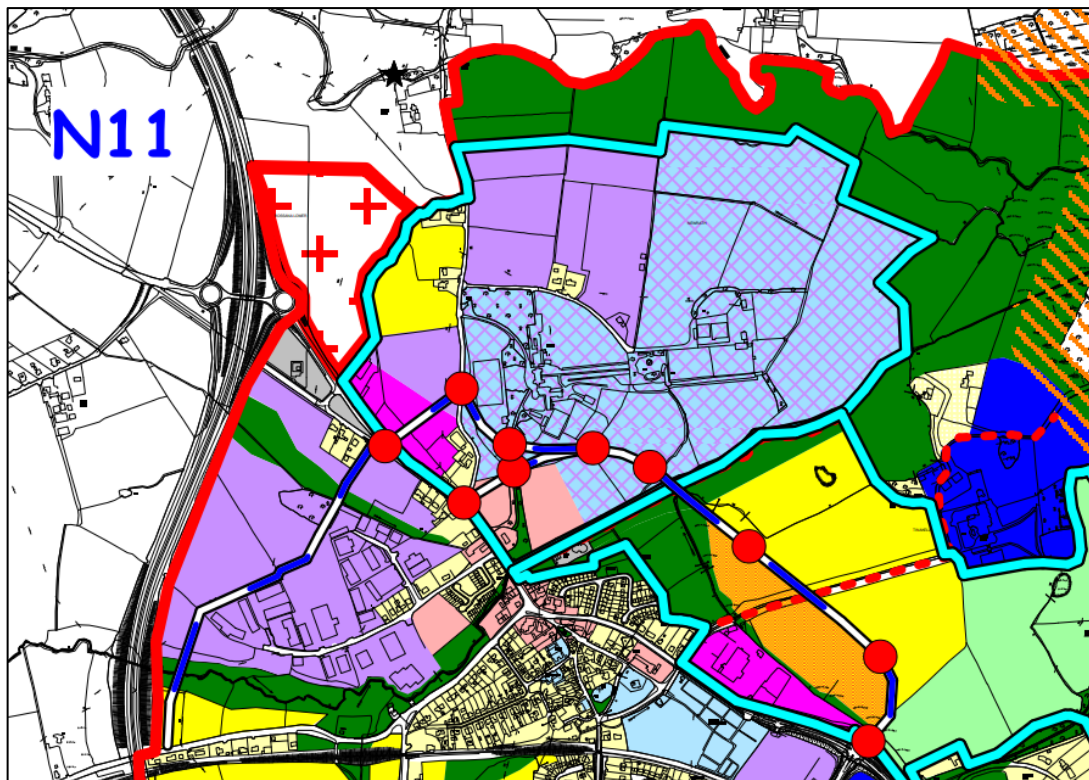


Figure 10.0: Largest clustering of enterprise and employment zoned land within the *Wicklow Town and Rathnew Development Plan 2013-2019*. (Source: Wicklow County Council.)

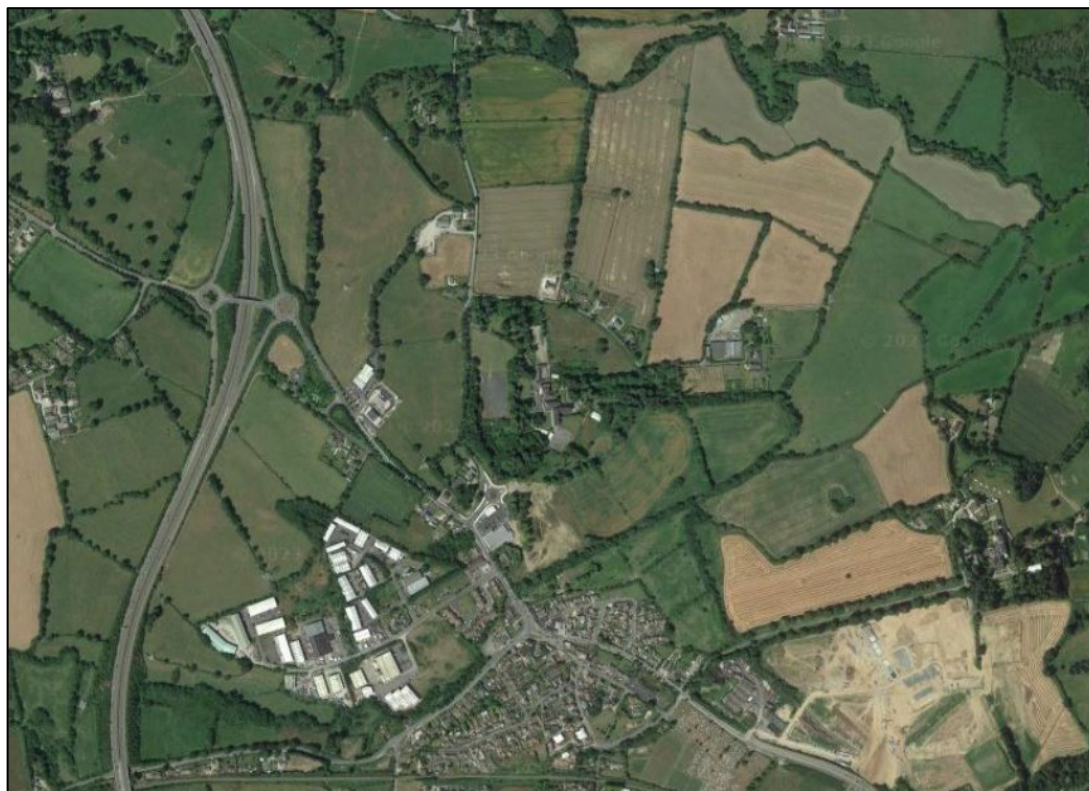


Figure 11.0: 2023 aerial view of the primary enterprise and employment area of Wicklow Town/Rathnew, which remains relatively undeveloped compared to the 2013 zonings. (Source: Google Maps, as annotated by Tom Phillips + Associates, 2023.)

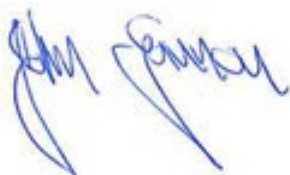
6.0 CONCLUSION

As identified in the Issues Papers for the forthcoming *Wicklow Town and Rathnew Development Plan 2024*, Wicklow Town and Rathnew will require the provision of c. 1,500 new homes to be delivered between now and 2031. It is evident from the analysis provided above that the current quantum of zoned residential land available is unlikely to be capable of meeting this need. As highlighted in the Issues Papers, in line with National planning guidance, 30% of new homes are required to be in established built-up areas, which indicates that the other 70% can be provided in other suitable locations. This equates to c. 1,050 new units to be accommodated outside of the built-up areas.

Our macro analysis above has clearly demonstrated a number of key issues that should be considered in the formulation of a new land use strategy for Wicklow-Rathnew in the delivery of new residential development. Firstly, much of the land zoned for residential purposes in the previous plan is now either fully developed or committed (active planning permissions are in place). The majority of this activity is occurring in an area that is now well established as a primary residential location with the requisite social infrastructure required to serve this form of development. In addition, as detailed above, there are significant lands which have been consistently zoned for residential purposes within the plan boundary that are unlikely to be brought forward for new residential development. This is evidenced by the lack of residential activity on these lands often over several plan cycles. It makes no logical sense in planning terms to continue to zone lands in this manner especially where there are visible alternatives that are clearly available for development in the short term free from constraint. Such an approach will continue to skew the analysis of available zoned land in the area.

Finally, the approach to enterprise and employment zoned lands in the area requires to be reviewed. There are significant available commercial zoned lands to the north, which will meet the enterprise and employment needs of the Wicklow-Rathnew settlement for many years to come. In order to encourage innovation and the benefits of clustering, this is the logical location for new enterprise and employment uses to become established and where they will also benefit from good quality accessibility. Lands zoned for commercial uses elsewhere in the settlement run the risk of not being sufficiently attractive or viable for this form of use. In such circumstances, alternative uses should be considered including residential, especially where the overall character of the adjoining area is strongly tending towards residential.

We look forward to written acknowledgement of receipt of this submission in due course.



John Gannon
Director
Tom Phillips + Associates