



# Wicklow Town - Rathnew LAP Submission - Report

<b>Who are you:</b>	Agent
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<b>Reference:</b>	WRLAP-153325
<b>Submission Made</b>	September 28, 2023 3:35 PM

## Topic

Compact Growth - Housing - Population Growth

## Submission

Please refer to the submission document attached in relation to land at Ballybeg, Rathnew.

## Topic

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

## Submission

Please refer to the submission document attached in relation to land at Ballybeg, Rathnew.

## File

Rathnew Submission.pdf, 3.43MB



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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 Ballybeg, Rathnew.**

Dear Sir/ Madam,

On behalf of our client, Rathnew Partnership 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 Ballybeg, Cuckoo's Lane, Rathnew - Wicklow Town (Folio Numbers WW 13969F & WW 1555F). Please refer to the location map in Appendix A.

**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 13969F and has an area of 4.0Ha. The extent of the residentially zoned land is indicated as 'Plot A' on the extract from the 2013 – 2019 zoning map below.

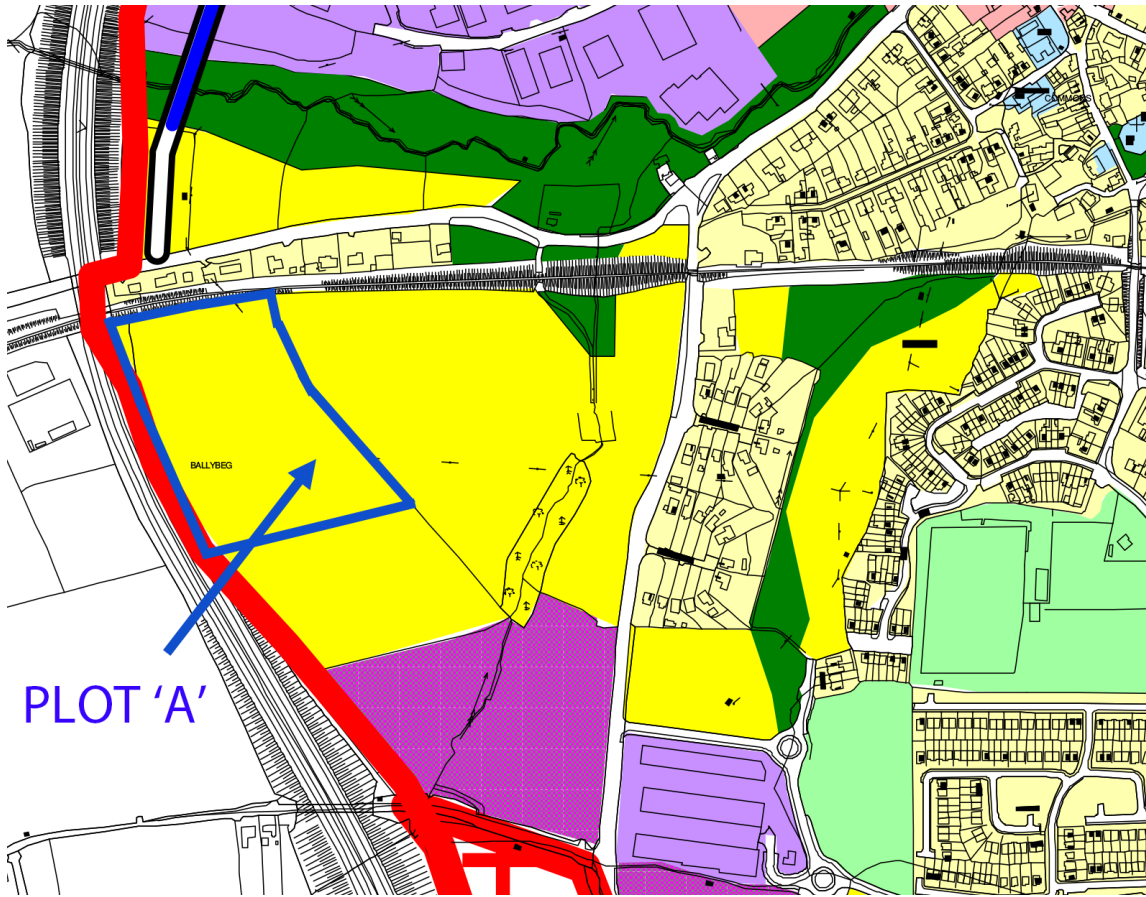


Fig. 1 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land with current residential zoning (Plot A - outlined in blue line).

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 (700m) 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) Foul Drainage & Mains Water Supply: The land is serviceable with a water main located in the R772 (Old N11/ Dublin Road) adjacent to the site. Connection to the foul sewer will be to the east of the site to existing Irish Water network.
- 4) Surface Water: The land is served by an existing surface water outfall in the form of a stream located to the east of the land.
- 5) Footpath & Road Access: There is a public footpath connection which currently serves the R772 (Old N11/ Dublin Road). This footpath and local road network would be extended into the land across the other plot within our client's ownership and the adjacent zoned land.

- 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 developments located to the north and east of the land.  
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 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. Higher density development may be appropriate considering the potential for future public transport links and the proximity to the adjoining rail line where a new rail station could be considered.

The remaining part of our client's land is currently zoned for Enterprise & Employment (E2 – Warehousing) in the Wicklow Town & Rathnew Local Area Plan (2013 – 2019). This land is comprised within Folio WW 1555F and has an area of 4.4Ha. The extent of the Enterprise & Employment zoned land is indicated as 'Plot B' on the extract from the 2013 – 2019 zoning map below.

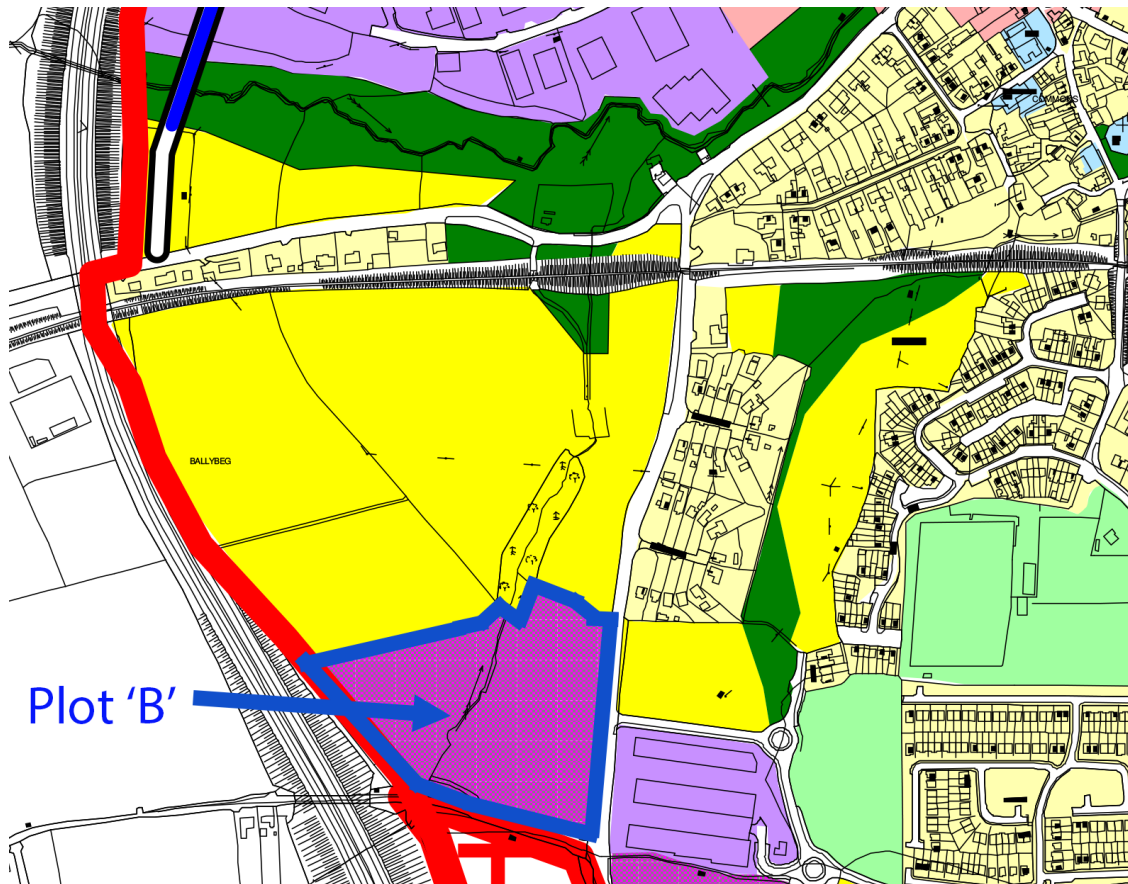


Fig. 2 Extract from Wicklow Rathnew LAP Zoning Map 2013-2019 indicating land with current Enterprise & Employment zoning (Plot B - outlined in blue line).

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 Development Plan Boundary.
- 2) It is located within walking distance (700m) 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) Foul Drainage & Mains Water Supply: The land is serviced. The land was the subject of a pre-connection application to Irish Water. A copy of this letter of feasibility received from Irish Water is attached in Appendix B.
- 4) Surface Water: The land is served by an existing surface water outfall in the form of a stream that runs across the land.
- 5) Footpath & Road Access: There is a public footpath connection which currently serves the R772 (Old N11/ Dublin Road). The land is directly accessed via the R772 and Cuckoo's Lane.
- 6) 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 and east of the land.  
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 130 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. Higher density development may be appropriate considering the potential for future public transport links and the proximity to the adjoining rail line where a new rail station could be considered.

### **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 'built up' footprint of Rathnew.
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 land as it is located within 700m of a principal town.

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

The draft guidelines highlight the requirement for planned communities where the reliance on vehicular journeys to places of work, schools, community services and amenities are minimised. This land is directly adjacent to an existing rail line.

The 2008 – 2014 Local Area Plan included an objective to locate a rail station and transport hub in the area. A plan for a future rail link in this area would be in accordance with the principles of the Sustainable and Compact Growth Guidelines and should be considered as part of the new plan.

There are substantial lands zoned for Enterprise and Employment to the southeast at Ballybeg and Broomhall. Existing community amenities such as the GAA and Soccer clubs are located within walking distance of the land.

Schools are within walking and cycling distance of the land. This is all illustrated in the diagram below.

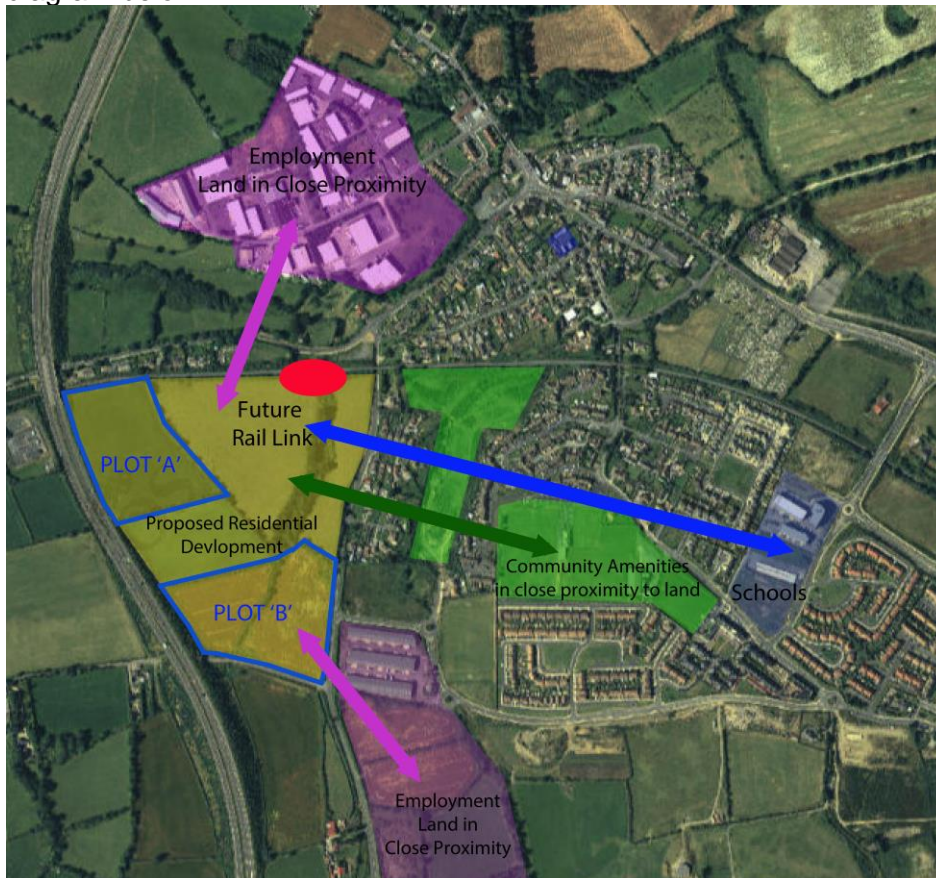
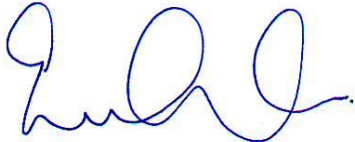


Fig. 3 Aerial View showing connectivity to existing and future employment and community amenities. (Plots A & B - outlined in blue line).

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.

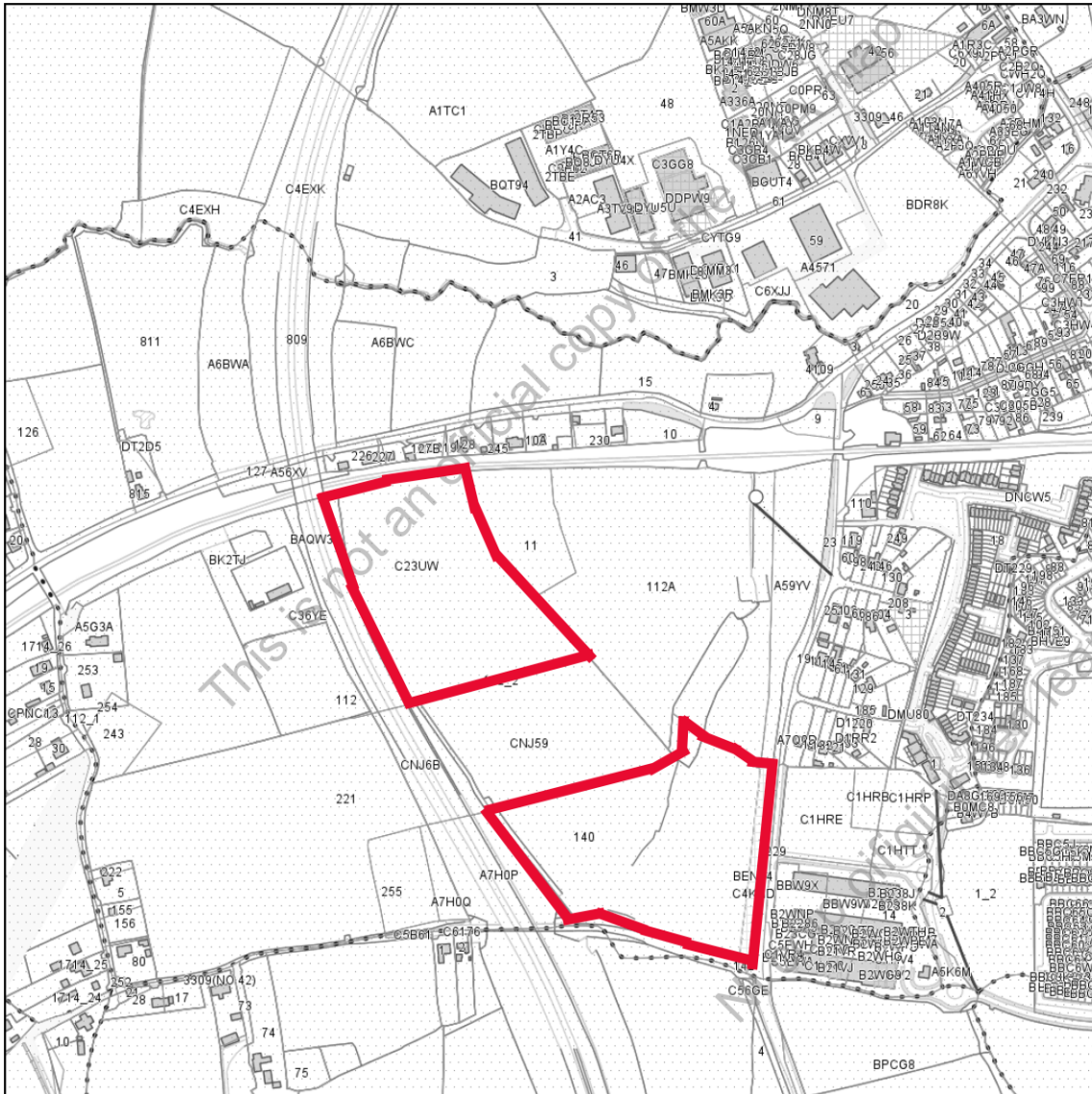
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Eoin J. Carroll MRIA

*For Eoin J. Carroll Architects*

*cc. Rathnew Partnership*

Appendix A: Site Location Map (OSI Map)



*Appendix B: Irish Water Feasibility Letter*



Alex Racheru  
AECOM,  
4<sup>th</sup> Floor Adelphi Plaza,  
Georges Street Upper,  
Dun Laoghaire,  
Dublin.

Letter Ref: CUST17125

Uisce Eireann  
Bosca OP 860  
Oifig Sheachadta  
na Cathrach Theas  
Cathair Chorcaí

Irish Water  
PO Box 860  
South City  
Delivery Office  
Cork City

[www.water.ie](http://www.water.ie)

23 March 2017

Dear Sir,

**Re: CUST17125 - Water and Wastewater pre-connection enquiry for proposed Mixed Use Development – Subject to contract.**

Irish Water has reviewed your pre-connection enquiry in relation to water and wastewater connections at Rathnew, Co Wicklow. Based upon the details you have provided with your pre-connection enquiry and on the capacity currently available as assessed by Irish Water, we wish to advise you that subject to upgrade works and a valid connection agreement being put in place, your proposed connection to the Irish Water network can be facilitated.

**Wastewater:**

Feasible subject to the completion of an Irish Water Capital Project to deliver Infrastructure Upgrade (project currently not on the Irish Water CIP). The proposed development requires an upgrade of the existing network, the existing 0.150 sewer has insufficient capacity to take the development flow thus requiring a new 225mm sewer (1.1km in length) to be constructed from the site to the existing pump station.

**Water:**

Feasible subject to the completion of an Irish Water Capital Project to deliver Infrastructure Upgrade (project currently not on the Irish Water CIP). The proposed development requires an upgrade of the existing network of approx. 200m extension of the 150mm water main which runs along Hazelbrook Road to the proposed site.

If you wish to progress your project based on contributing a portion of the costs towards Irish Water constructing the required infrastructural upgrades you are advised to contact the Irish Water New Connections Regional Lead Oliver Fogarty on 01 8925285 quoting reference number CUST17125.

You are advised that this correspondence does not constitute an offer in whole or in part to provide a connection to any Irish Water infrastructure and is provided subject to a connection agreement being signed at a later date.

A connection agreement can be applied for by completing the connection application form available at [www.water.ie/connections](http://www.water.ie/connections). Irish Water's current charges for water and wastewater connections are set out in the Water Charges Plan as approved by the Commission for Energy Regulation.

If you have any further questions, please contact us on **1850 278 278** or **+353 1 707 2828, 8.00am-4.30pm, Mon-Fri** or email **newconnections@water.ie**. For further information, visit **www.water.ie/connections**

Yours sincerely,



**Maria O'Dwyer**  
**Connections and Developer Services**

Wicklow CC Planning Department, Viewing Purposes Only!