



Wicklow Town - Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Farry Town Planning td
Email Address:	vincentfarry@gmail.com
Reference:	WRLAP-151956
Submission Made	September 26, 2023 3:21 PM

File

re-zoningRATHNEW.pdf, 0.93MB

re-zoningRATHNEW_1.pdf, 0.93MB

re-zoningRATHNEW2.pdf, 0.79MB

Farry Town Planning Ltd.

Suite 180
28 South Frederick Street
Dublin 2

Phone (01) 677 8180
Mobile 087 288 7311
vincentfarry@gmail.com

25 September 2023

Senior Executive Officer
Wicklow County Council
County Buildings
Wicklow

DRAFT RATHNEW LOCAL AREA PLAN 2024 - 2030 LAND AT BROOMHALL RATHNEW CO. WICKLOW

Dear Sir or Madam

We refer to the above *Draft Local Area Plan 2024*, the preparatory stage of which is currently in progress and we confirm that we act for the owner of land in the study area, Mr. Maurice Sheehy.

Mr. Sheehy is a partner in the longstanding alliance, Broomhall Estates, which has a long-term commitment to development in Rathnew. In this latter capacity, our client has built most of the houses in this centre and has thus facilitated the achievement of the Council's residential objectives for Rathnew. Broomhall Estates has also provided land for the Town Relief Road, which opened up residential sites and built Saunders Road, which links this settlement with National Road N11.

Indeed, Mr. Sheehy's company has also built a neighbourhood shopping centre ('*Merrymeeting*') which provides existing and future residents of this immediate area, including the subject site, with a range of shops and facilities such as a medical centre, has donated land *gratis* for playing pitches (both soccer and Gaelic football) and has provided land on which two schools have been constructed. As these infrastructural, retail and community facilities are adjacent to the subject site, the availability of services is clearly relevant to the request to -zone this land for new housing.

We hereby invite Wicklow County Council to dedicate the land to which this submission relates, as depicted below, for '*New Residential*' purposes. The zoning history of this tract indicates that this property is located within the proposed built-up area which surrounds Rathnew and that it should be developed for urban purposes. The key question in this case comprises, not whether it should be zoned for new development but rather the type of activities which should be accommodated thereon.

Strategic planning policy, as set out in the *National Planning Framework* and in the *Regional Spatial Economic Strategy* seeks to promote new residential development in existing centres, such as Wicklow Town / Rathnew and we consider that the dedication of this land for housing purposes would accord with the provisions of these documents, insofar as they promote new sustainable development.

However, whilst the Council envisages the expansion of Rathnew, the current land-use arrangements which are set out in the *Wicklow Town / Rathnew Development Plan 2013* envisage that this tract would accommodate Enterprise and Employment activities. This designation has been in existence for some time (certainly in excess of 15 years), without actually being realised and the preparation of the *Local Area Plan 2024* provides a suitable opportunity for this existing approach to be revisited.

Moreover, we ask the Planning Authority to note how the landowner's building company primarily focuses on the construction of homes and there is clearly a mismatch between this main activity and the zoning of the subject site. The fact that our client is not an industrialist is a key reason as to why this particular property has not been developed for the purposes identified in the zoning scheme which is set out in the current *Wicklow Town / Rathnew Development Plan 2013* or its predecessors.

Conversely, a re-zoning of this tract so as to facilitate a housing scheme thereon is likely to result in the early development of this land for residential purposes; as the Council will be aware from its Planning Register, Broomhall Estates is not engaged in speculative activities and this present request is prompted solely by our client's wish to construct new homes which would contribute to the supply of new residential accommodation in line with the *Wicklow County Development Plan 2022*.

Indeed, as noted Broomhall Estates has been a principal developer of new housing in this centre and has provided a range of non-residential features and facilities, such as shops and commercial development(s), creches and swathes of public open space, as well as sites for new schools in this immediate area. The re-zoning of this land in the manner set out in this submission would allow the best use of these educational, recreational, retail and community services and amenities and we consider that the suggested re-zoning of the subject site should be viewed favourably in this context.

Yours faithfully



Farry Town Planning Ltd.

Farry Town Planning Ltd.

Suite 180
28 South Frederick Street
Dublin 2

Phone (01) 677 8180
Mobile 087 288 7311
vincentfarry@gmail.com

ZONING SUBMISSION ON A TRACT OF LAND AT BROOMHALL RATHNEW CO. WICKLOW

**RE-ZONING REQUEST PREPARED BY
FARRY TOWN PLANNING LTD.
ON BEHALF OF
MR MAURICE SHEEHY.**

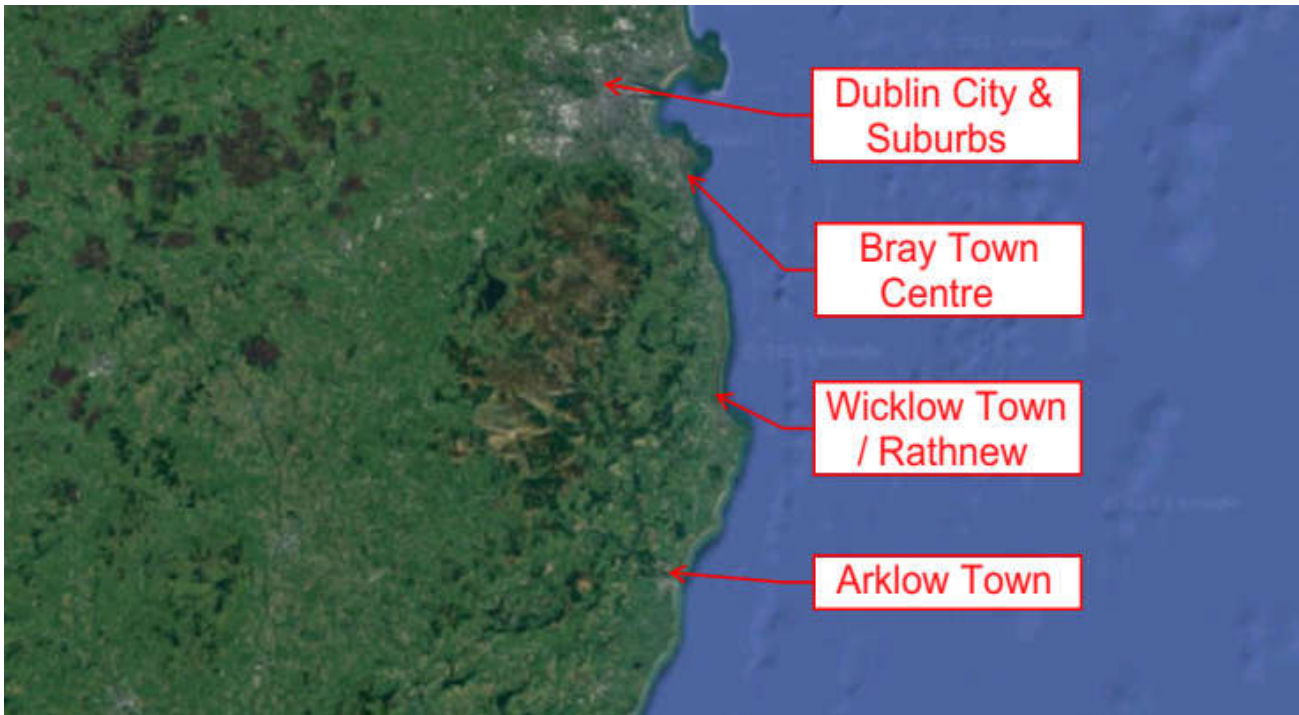
Index to Report

- 1. Introduction**
- 2. The Subject Site**
- 3. Select Planning History**
- 4. National and Regional Planning Policy**
- 5. Local Planning Policy**
 - (i) Wicklow County Development Plan 2022
 - (ii) Wicklow Town / Rathnew Development Plan 2013
 - (a) Population Projections
 - (b) Zoning Provisions
 - (iii) Wicklow Town Environs Rathnew Local Area Plan 2008
- 6. Submission**
 - (i) Physical Planning Issues
 - (ii) The Principle of Residential Development
 - (iii) Housing Demand
 - (iv) Infrastructure
- 7. Concluding Comments**

1. Introduction

This town planning report has been drafted on behalf of Mr. Maurice Sheehy and has been prepared for lodgement with the Council, as the planning authority for Co. Wicklow, in the context of its forthcoming *Draft Rathnew Local Area Plan*, which will be placed on public exhibition pursuant to the requirements of planning law. The Planning Authority is now accepting third-party comments on the contents of this document and the present report has been prepared in this particular context.

This submission invites the Planning Authority to re-zone certain land on the edge of the built-up area which surrounds Rathnew for new residential development purposes. The Council already considers that this land is located within the development envelope which encircles this settlement and the key issue which arises comprises the best use of this site, in terms of the growth of Rathnew.



Aerial Image 1: Wicklow / Rathnew comprises one of a number of coastal centres which are located to the south of the Capital.

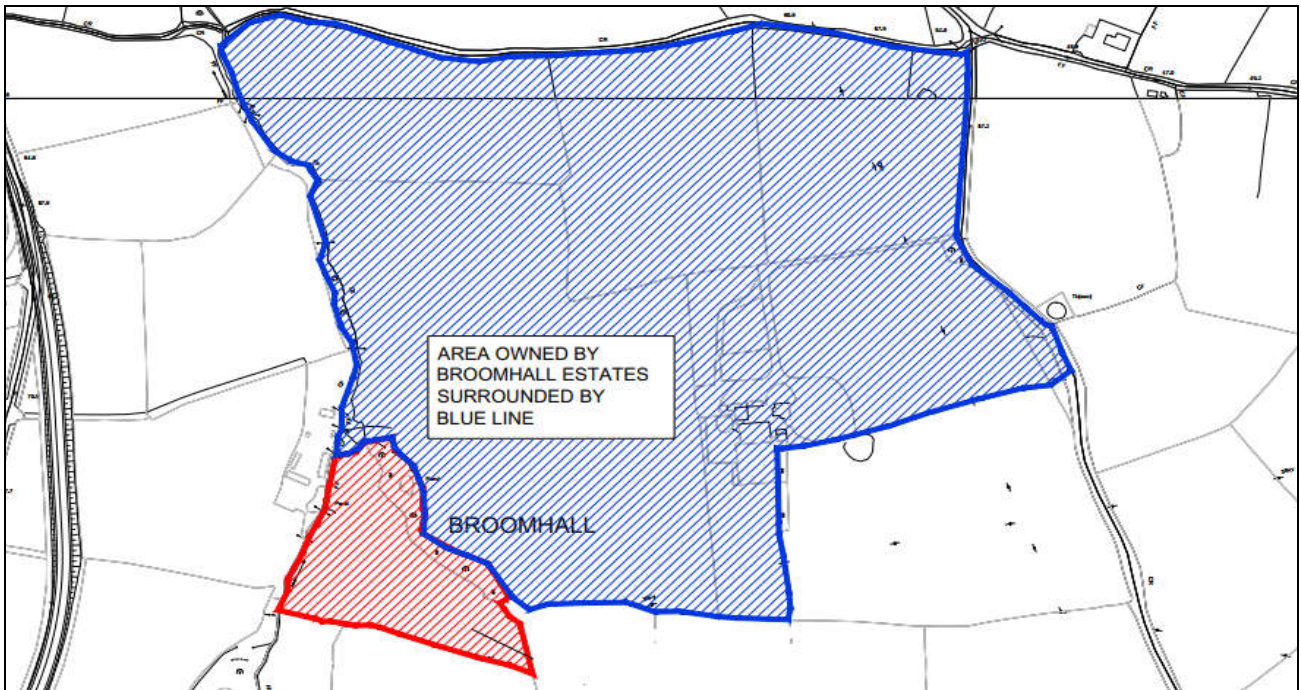
Indeed, as the County Council will be aware, Broomhall Estates has been a principal developer of new housing in this centre and has provided a range of non-residential features and facilities which support the expanding community in this particular settlement. Our client has constructed shops and commercial development(s), built creches and provided large swathes of public open space for both active and passive recreational activities and has donated sites for new schools in this immediate area. The re-zoning of this land in the manner set out in this submission would allow the best use of these educational, recreational, retail and community services and amenities and we consider that the suggested re-zoning of the subject site should be viewed favourably in this context.

For ease of presentation, this report outlines a number of background policies and other strategic considerations, before turning to the detailed arguments which support the recommended approach.

Indeed, as the County Council will observe, our endorsement of the re-zoning of this land is wholly consistent with current policy and our suggestion that extra development land will be required in this centre over the forthcoming plan-period accords with the *Wicklow County Development Plan 2022*.

2. The Subject Site

The subject site comprises a regularly-shaped tract which covers a total area of 2.48 ha (6.12 ac) and which is located within Rathnew which is, in functional terms, part of Wicklow, the County Town.



Map 1: The land to which this re-zoning request relates is edged in red ink above.

The land to which this re-zoning request relates slopes in a gently manner and is relatively banal in physical town planning terms, to the degree that it contains no ecological features, cliff faces, mountain peaks, lakes or scenic watercourses, rock outcrops, heritage artefacts, national monuments, protected structures, mature stands of specimen trees, or other features of environmental or ecological significance whatsoever. We consider that the subject site is not affected by any physical planning constraint(s) which would affect its future development for residential purposes.



Aerial Image 2: The site is within Rathnew and is proximate to local amenities, as well as the extensive array of amenities in Wicklow, the County Town.

The land to which this particular submission relates is used for agricultural purposes, being laid out in grassland (as illustrated below) and is adjacent to both existing suburban residential development and land on which a new housing estate is currently being constructed. Slightly further to the north-east thereof is the modern Merrymeeting Neighbourhood Centre which provides local residents with an array of local services and which was originally constructed by Broomhall Estates.



Photographs 1 & 2: The site slopes gently and, being laid out in grassland, is used for farming activities (currently zoned Enterprise and Employment).



3. Planning History

The County Council's Planning Register contains no previous application entries for the subject site.

This land abuts the tract on which the Planning Authority granted permission under reg. 2237 for a:

'housing development of 93 dwelling units consisting of 18 duplex units, 44 semi-detached dwellings, 25 terraced dwellings, 4 apartments, 2 detached dwellings, and a creche, with connection to services and all associated works including roads, footpaths, boundaries and boundary treatments, public lighting, open spaces and landscaping, attenuation system and new entrance from Saunders Lane Road, and relocation of attenuation system previously granted under ref. no 18/50 to be located on these lands...'

4 National and Regional Planning Policy

While the *National Planning Framework* indicates that in setting overall targets for growth, it is the pattern of development that is being targeted, rather than precise numbers, although it provides a target in the Eastern and Midlands Region of 490,000-540,000 additional people by 2040, of which 235,000 – 293,000 extra inhabitants are targeted for Dublin City and Suburbs. Objective 68 states:

'A Metropolitan Area Strategic Plan¹ may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area...'

The transitional population projections plot a growth target which, for Co. Wicklow is 155,000 - 157,500 by 2026 and 160,500 – 164,000 by 2031. The 'Roadmap' specifies that scope for 'headroom', not exceeding 25 per cent, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline, including Co. Wicklow.

The *Regional Spatial and Economic Strategy* provides a further elaboration which includes a breakdown of population projections to county level, based on the *National Planning Framework*, which should be used by councils in the formulation of the core strategies of their development plans.

5. Local Planning Policy

(i) Wicklow County Development Plan 2022

In accordance with the methodology and criteria set out in the *Regional Spatial and Economic Strategy*, all settlements with a population of over 1,000 persons (2016), have been evaluated in order to determine their appropriate categorisation in the new settlement hierarchy. A classification of 10 tiers has been devised and within this arrangement, Wicklow and Rathnew have been identified as a Level 2 Key Town in Table 3.3 Wicklow Settlement Hierarchy, which comprises an¹:

'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'

Table 3.4 of the *Plan* notes that as total of 14,114 persons were recorded in these combined centres in the Census of Population, 2016 and establishes a population target of 18,515 persons by 2028.

(ii) Wicklow Town / Rathnew Development Plan 2013

(a) Population Projections

This *Development Plan* was prepared by Wicklow Town Council in conjunction with Wicklow County Council, in accordance with the provisions of the Planning and Development Act 2000 (as amended) and is the latest detailed statutory planning instrument for Wicklow Town and Rathnew. It observes how, in the settlement hierarchy of Co. Wicklow, Wicklow Town-Rathnew is designated a '*Large Growth Town I*' and states that adopted settlement policy SS1 is relevant to this plan area:

¹ It is expected that Key Towns will have a 'growth rates of c. 35% having regard to their identification in the RSES as towns suitable for higher levels of growth'.

‘To implement the County Wicklow settlement strategy having regard to the availability of services and in particular, to direct growth into the designated metropolitan growth centre and the large, moderate and small growth towns in the Greater Dublin hinterland area’.

Under policy SS4 , the Council seeks to *‘implement the population growth targets as set out in Table 4.3’* of this instrument, with the numerical targets set out therein anticipating that Wicklow – Rathnew would expand from 19,000 persons in the year 2016 to 24,000 inhabitants in the year 2024. Section 2.2.2 of this *Development Plan* (which is entitled *‘Settlement and Population’*) states, *inter alia*, that

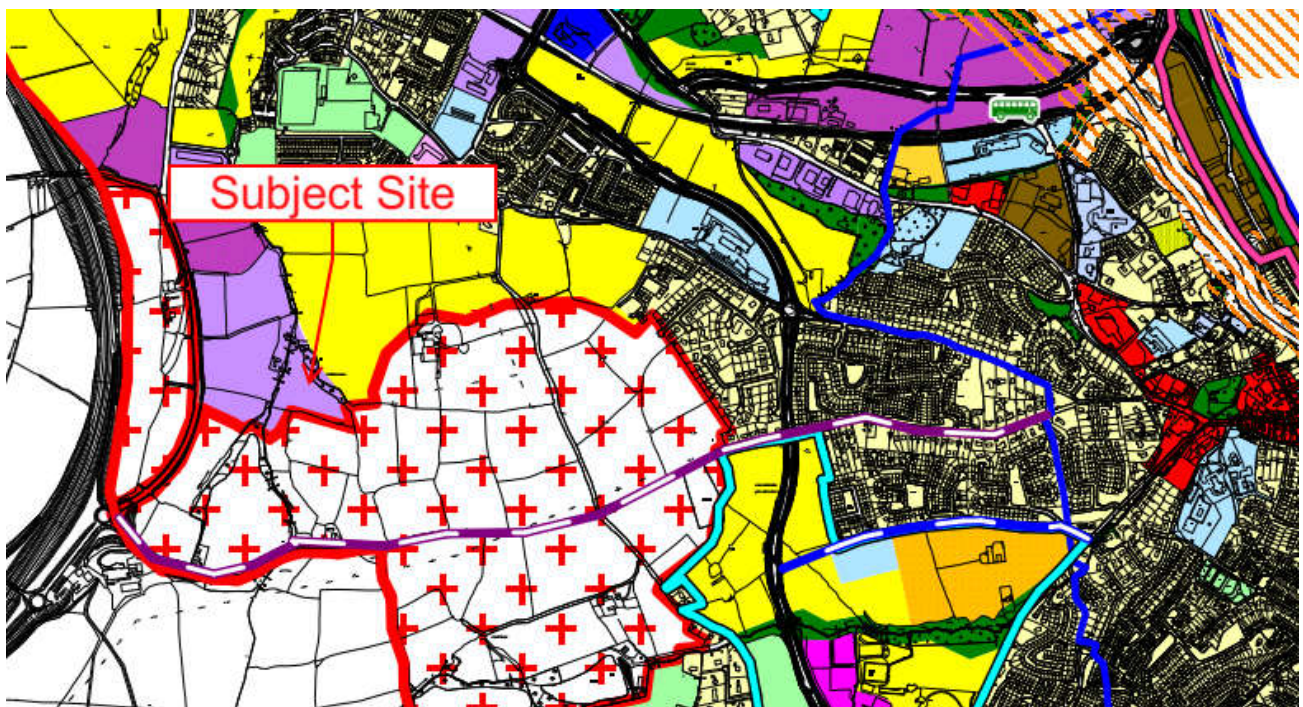
‘The settlement and population objectives for the plan flow directly from the National Spatial Strategy 2002 – 2020, the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and the Wicklow County Development Plan 2010-2016. Wicklow Town-Rathnew is within the ‘Dublin Consolidation Zone’ of the NSS and is a ‘Large Growth Town 1’ in the hinterland of the Greater Dublin Area in the RPGs and the County Development Plan. The 2011 population for the plan area is estimated at 13,4681 and the County Development Plan provides for a 2016 target population of 19,000, increasing to 24,000 in 2022’.

We hereby reproduce s.2.2.3 of this *Development Plan* (headed *‘Housing and Phasing’*) as follows:

‘In order to accommodate this potential growth in population, the plan must make provision for growth in the housing stock. This will entail ensuring that there is sufficient zoned and serviced land available for the construction of new housing. The plan provides for “headroom” or “market factor” which is ‘extra’ land that should be zoned over and above the minimum amount needed to accommodate the 2019 population target. Headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise. The basis for calculating the necessary ‘headroom’ for the plan period i.e. up to 2019, has been the housing unit requirement over the period 2019-2022’.

(b) Zoning Provisions

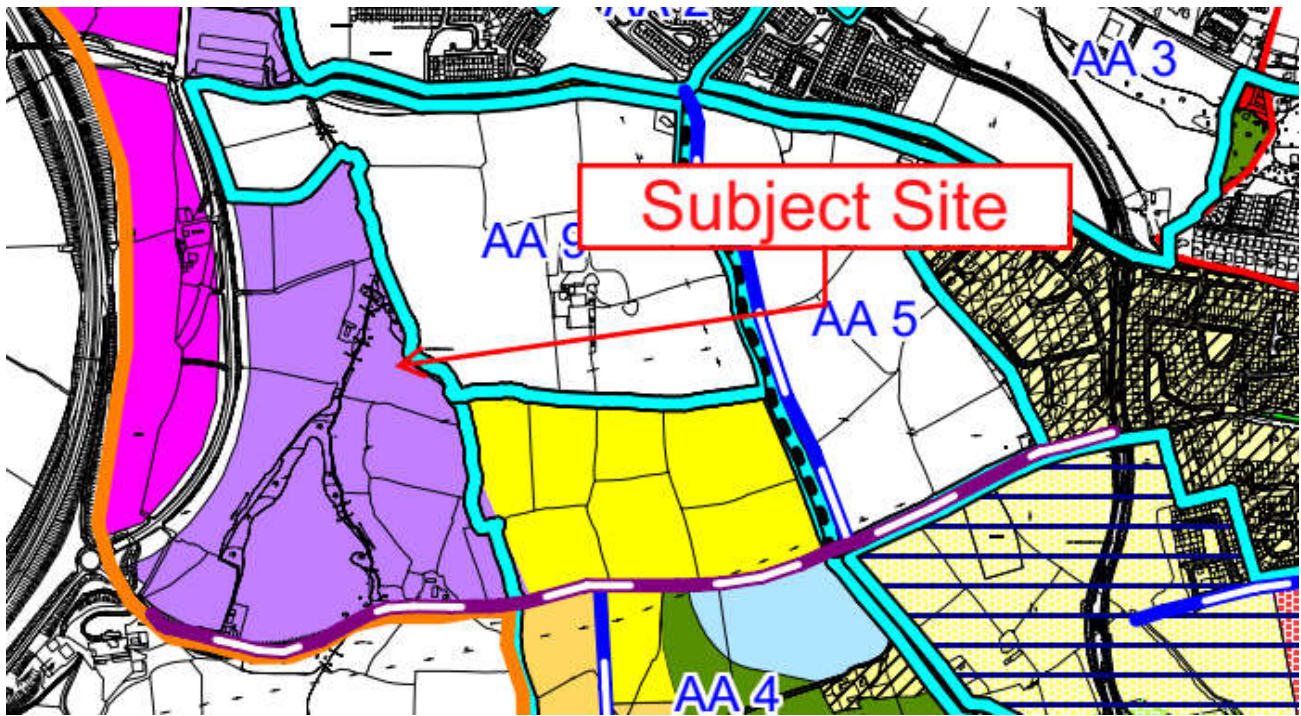
This site is governed by the County Council’s Enterprise and Employment land-use zoning under the *Wicklow Town / Rathnew Development Plan 2013 - 2019*. This particular tract abuts another Enterprise and Employment property located to its immediate west, which is in separate ownership.



Map 2: The zoning objectives which apply to the land to which this submission relates.

(iii) Wicklow Town Environs Rathnew Local Area Plan 2008

This arrangement was carried forward from the scheme which was set out in the *Wicklow Town Environs Rathnew Local Area Plan 2008*, with this earlier land-use zoning map being shown below:



Map 3: The zoning objectives which applied to this land between 2008 and 2013.

6. Submission

(i) Physical Planning Issues

It is immediately apparent from an examination of the Council's documents, both historical and modern, that there are no physical, functional, amenity, technical or engineering reasons as to why the subject land cannot be developed for housing purposes; this tract is not flood-prone, does not contain archaeological artefacts, does not accommodate protected structures and is not scenic in character. There are no factors which would prevent this land being developed for urban purposes.

This approach accords with the current and previous zoning arrangements which have been adopted by Wicklow County Council, all of which acknowledge the potential contribution which this land can make towards the general expansion of Wicklow Town and Rathnew. Indeed, given the current land-use arrangements in the *Wicklow Town / Rathnew Development Plan 2013 - 2019*, wherein this land is statutorily earmarked for Enterprise and Employment activities, the Planning Authority has candidly accepted that the tract can be used as part of this settlement and the key issue thus comprises whether it should be used for housing rather than commercial or recreation purposes. This approach is wholly consistent with the availability of infrastructural services, as noted overleaf.

(ii) The Principle of Residential Development

There is an unquestionable need for additional housing, of all types, in the country and the principles of sustainability, along with the provisions of the *National Planning Framework*, suggest that such accommodation should be directed into existing centres, such as Rathnew, in the first place, where local services and amenities, such as playing fields and neighbourhood retail facilities, already exist.

Indeed, we have already observed how Broomhall Estates has shown its clear commitment to the expansion of Rathnew over a lengthy period (in excess of a quarter-of-a-century), not only in terms of its extensive house-building activities in this location but also in the provision of associated amenities, which are of a type which are used daily by nearby inhabitants. Such facilities would equally be available to future residents living in new housing which would be erected on the subject site and the arguments in favour of using this land for residential development are overwhelming.

Moreover, we ask the Planning Authority to note how the landowner's firm, Broomhall Estates, primarily focuses on house building and there is clearly a mismatch between such activities and the zoning of the subject site. The fact that our client is not an industrialist is a key reason as to why this property has not been developed for the purposes identified in the zoning arrangement which is contained within the current *Wicklow Town / Rathnew Development Plan 2013* or its predecessor(s).

Conversely, a re-zoning of this tract so as to facilitate a housing scheme thereon is likely to result in the early development of this land for residential purposes; as the Council will be aware from its Planning Register, Broomhall Estates is not engaged in speculative conduct and this present request is prompted solely by our client's wish to construct new homes which would contribute to the supply of residential accommodation pursuant to the *Wicklow County Development Plan 2022-2028*.

To the degree that zonal boundaries often acknowledge landownership patterns we note that, whereas this site is owned by Mr. Sheehy and that it can easily be accessed through an adjacent residential development to the north / east which is in his control, the neighbouring tract of Enterprise and Employment land to its west is in separate ownership. It would be more logical for the subject site to be developed by Mr. Sheehy as an extension to the estate which the Council permitted under reg. 22/37, rather than being subsumed into an unrelated commercial development.

When preparing this submission, we have examined other Enterprise and Employment properties in Rathnew, along with large swathes of land which have been dedicated for industrial purposes, especially to the north of this settlement and in the Wicklow Port area. It is our opinion that a sufficient area exists to allow for commercial activity in this centre and that society's need for residential development land counterbalances the continuation of the current zoning arrangement.

(iii) Housing Demand

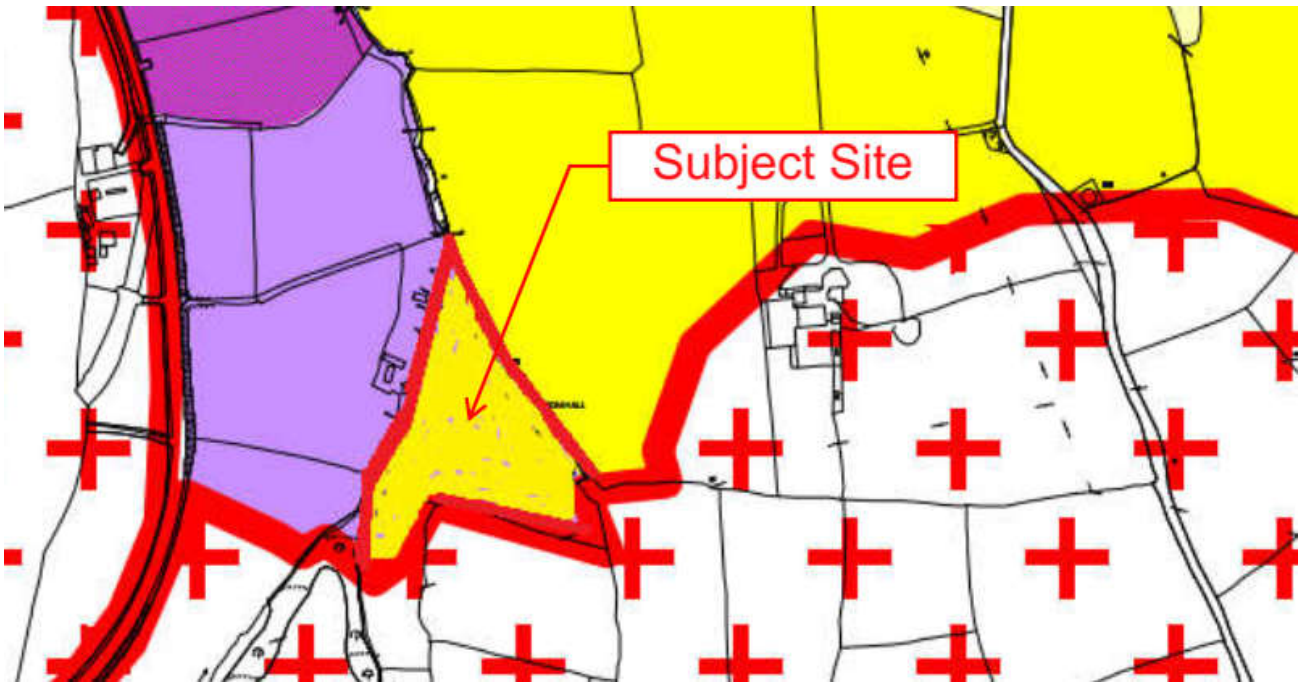
In line with the designation of the combined settlement of Wicklow Town / Rathnew as a Level 2 Key Town in Table 3.3 of the *Wicklow County Development Plan 2022*, the Planning Authority has statutorily established a population target of 18,515 inhabitants in this centre by the year 2028 (which comprises an increase of 4,401 persons on the recorded figure from the *Census of Population, 2016*).

Although the exact number of new dwellings which are required to meet this population target is unclear, on the basis that it is largely dependent on household formation rates, which are uncertain, the issues paper which has been published for the pre-draft *Wicklow Town - Rathnew Local Area Plan* estimates that '*Wicklow Town – Rathnew will need c.1,500 new homes built between now and 2031*'.

It is our opinion that the land to which this submission relates can make a clear and indeed, a timely contribution towards the supply of residential accommodation in Wicklow Town / Rathnew and that such a scheme would wholly accord with the principles of sustainability for the reason set out above.

(iv) Infrastructure

In line with the zoning of this land for urban purposes and with the presence of residential and business / commercial development elsewhere within this general area, the subject site is serviced, or is serviceable through the extension or upgrading of existing pipe infrastructure, which already caters for other neighbouring sites, to the subject land. Given our client's proven commitment to Rathnew and its experience of developing estates in this immediate area, we do not envisage that water supply, stormwater drainage or sewerage facilities would prevent this land being developed.



Map 4: The zoning of the subject site for residential purposes would be consistent with the use, or the dedication, of other lands to its north / east which are also in our client's control, for housing development.

7. Concluding Comment

There are no physical, functional, amenity, ecological, technical or environmental factors which would prevent this land being developed for purposes connected with the expansion of Wicklow Town – Rathnew; this is clear and indeed, this view wholly accords with the longstanding zoning history of the subject site, wherein the Council treats this tract as forming a part of this settlement.

Strategic planning policy promotes new residential development in existing centres, such as Wicklow Town / Rathnew and such new residential accommodation is greatly needed, given the housing crisis which the country is facing. However, this property cannot be developed for such activities, given that the *Wicklow Town / Rathnew Development Plan 2013* envisages that it tract would accommodate Enterprise and Employment, Tourism and Open Space. The re-zoning of this site to facilitate much-needed residential development and would accord with the principles of sustainability.


Farry Town Planning Ltd.

Farry Town Planning Ltd.

Suite 180
28 South Frederick Street
Dublin 2

Phone (01) 677 8180
Mobile 087 288 7311
vincentfarry@gmail.com

25 September 2023

Senior Executive Officer
Wicklow County Council
County Buildings
Wicklow

DRAFT RATHNEW LOCAL AREA PLAN 2024 MERRYMEETING RATHNEW CO. WICKLOW

Dear Sir or Madam

We refer to the above *Draft Local Area Plan 2024*, the preparatory stage of which is currently in progress and we confirm that we act for the owner of land in this area, Maurice and Paula Sheehy.

Mr. Sheehy is a partner in the longstanding alliance Broomhall Estates which has a long-term commitment to development in Rathnew. In this latter capacity, our client has built most of the houses in this centre and has thus facilitated the achievement of the Council's residential objectives for Rathnew. Broomhall Estates has provided land for the Town Relief Road, which opened up sites for new housing and built Saunders Road, which links this settlement with National Road N11.

Indeed, Mr. Sheehy's company has also built a neighbourhood shopping centre ('*Merrymeeting*') which provides existing and future residents of this immediate area, including the subject site, with a range of shops and facilities such as a medical centre, has donated land *gratis* for playing pitches (both soccer and Gaelic football) and has provided land on which two schools have been constructed. As these infrastructural, retail and community facilities are adjacent to the subject site the availability of services is clearly relevant to the request to re-zone this land for housing purposes.

We hereby invite Wicklow County Council to dedicate the land to which this submission relates, as depicted below, for '*New Residential*' purposes. The zoning history of this tract indicates that this property is located within the proposed built-up area which surrounds Rathnew and that it should be developed for urban purposes. The key question in this case comprises, not whether it should be zoned for new development but rather the type of activities which should be accommodated thereon.

Strategic planning policy, as set out in the *National Planning Framework* and in the *Regional Spatial Economic Strategy* seeks to promote new residential development in existing centres, such as Wicklow Town / Rathnew and we consider that the dedication of this land for housing purposes would accord with the provisions of these documents, insofar as they promote new sustainable development.

However, whilst the Council envisages the expansion of Rathnew, the land-use arrangements in the *Wicklow Town / Rathnew Development Plan 2013* envisage that this tract would accommodate Enterprise and Employment, Tourism and Open Space activities. This designation has been in existence for some time (certainly in excess of 15 years), without being realised and the preparation of the *Local Area Plan 2024* provides a suitable opportunity for this existing approach to be revisited.

Moreover, we ask the Planning Authority to note how the landowner's building firm, Broomhall Estates, primarily focuses on house building and there is clearly a mismatch between this activity and the zoning of the subject site. The fact that our client is not a hotelier or an industrialist is a key reason as to why this property has not been developed for the purposes identified in the zoning scheme which is set out in the *Wicklow Town / Rathnew Development Plan 2013* or its predecessors.

Conversely, a re-zoning of this tract so as to facilitate a housing scheme thereon is likely to result in the early development of this land for residential purposes; as the Council will be aware from its Planning Register, Broomhall Estates is not engaged in speculative conduct and this present request is prompted solely by our client's wish to construct new homes which would contribute to the supply of new residential accommodation in line with the *Wicklow County Development Plan 2022*.

Indeed, as the County Council will be aware, Broomhall Estates has been a principal developer of housing in this centre and has provided a range of non-residential features and facilities which support the expanding community in this particular settlement. Our client has constructed shops and commercial development(s), built creches and provided large swathes of public open space for both active and passive recreational activities and has provided sites for two new schools in this local area. The re-zoning of this land in the manner set out in this submission would allow the best use of these educational, recreational, retail and community services and amenities and we consider that the suggested zoning of the subject site should be viewed favourably in this particular context.

Yours faithfully



Farry Town Planning Ltd.

Farry Town Planning Ltd.

Suite 180
28 South Frederick Street
Dublin 2

Phone (01) 677 8180
Mobile 087 288 7311
vincentfarry@gmail.com

ZONING SUBMISSION ON A TRACT OF LAND AT MERRYMEETING RATHNEW CO. WICKLOW

**RE-ZONING REQUEST REPAIRED BY
FARRY TOWN PLANNING LTD.
ON BEHALF OF
MAURICE AND PAULA SHEEHY**

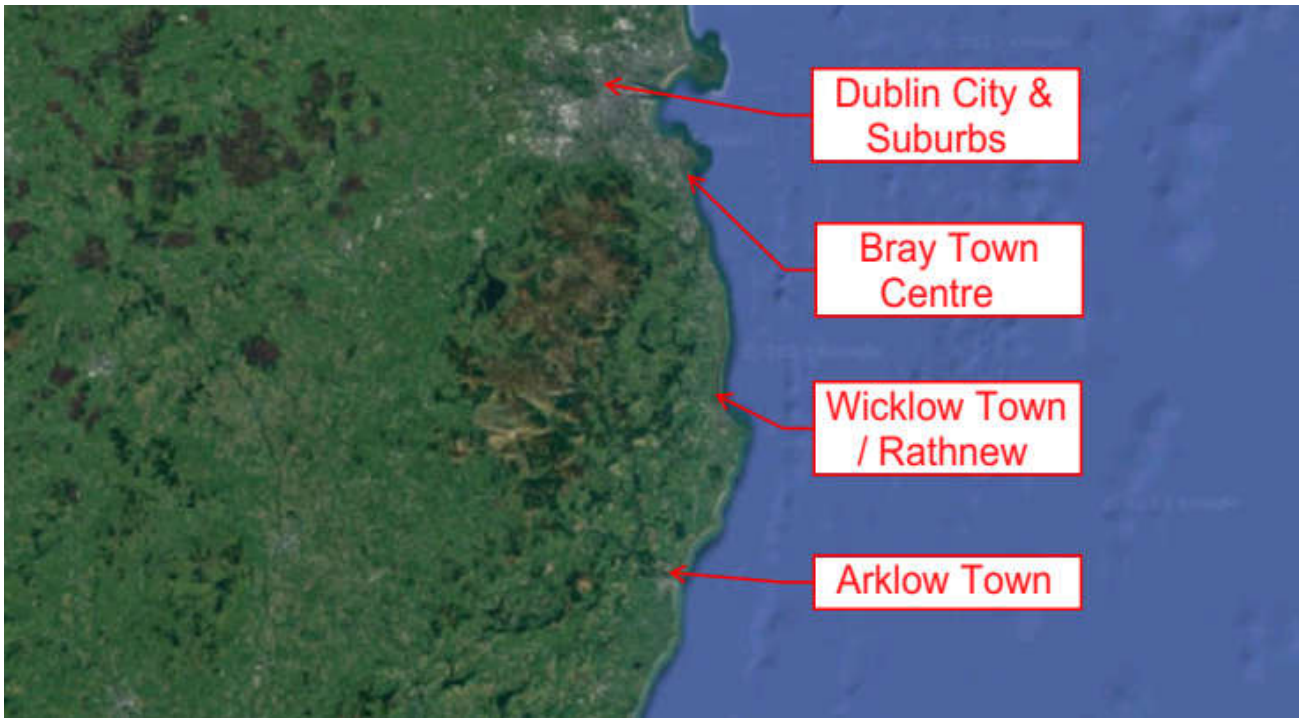
Index to Report

- 1. Introduction**
- 2. The Subject Site**
- 3. Select Planning History**
- 4. National and Regional Planning Policy**
- 5. Local Planning Policy**
 - (i) Wicklow County Development Plan 2022
 - (ii) Wicklow Town / Rathnew Development Plan 2013
 - (a) Population Projections
 - (b) Zoning Provisions
 - (iii) Wicklow Town Environs Rathnew Local Area Plan 2008
- 6. Submission**
 - (i) Physical Planning Issues
 - (ii) The Principle of Residential Development
 - (iii) Housing Demand
 - (iv) Infrastructure
- 7. Concluding Comments**

1. Introduction

This planning report has been drafted on behalf of Maurice and Paula Sheehy and has been prepared for lodgement with the Council, as the planning authority for Co. Wicklow, in the context of its forthcoming *Draft Rathnew Local Area Plan*, which will be placed on public exhibition pursuant to the requirements of planning law. The Planning Authority is now accepting third-party comments on the contents of this document and the present report has been prepared in this particular context.

This submission invites the Planning Authority to re-zone certain land on the edge of the built-up area which surrounds Rathnew for residential development purposes. The Council already considers that this land is located within the development envelope which encircles this settlement and the key issue which arises comprises the best use of this site, in terms of the growth of Rathnew.



Aerial Image 1: Wicklow / Rathnew comprises one of a number of coastal centres which are located to the south of the Capital and comprises a major Town.

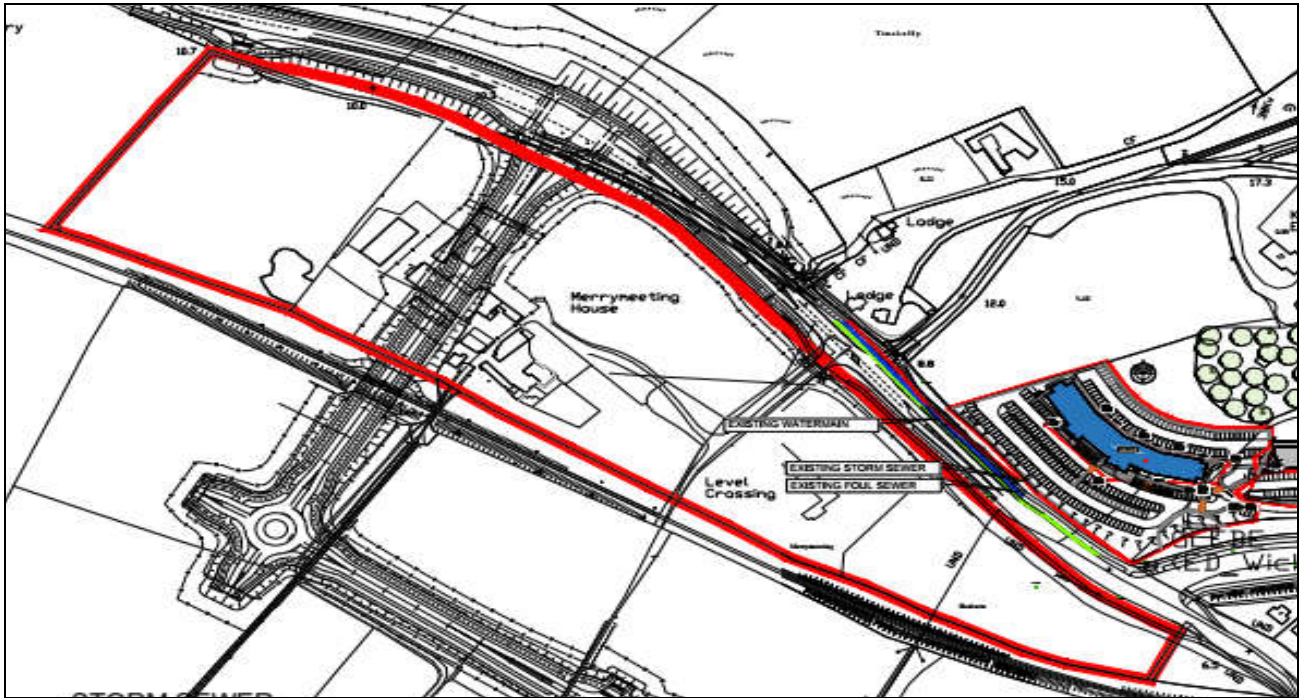
Indeed, as the County Council will be aware, Broomhall Estates has been a principal developer of new housing in this centre and has provided a range of non-residential features and facilities which support the expanding community in this particular settlement. Our client has constructed shops and commercial development(s), built creches, created large swathes of public open space for both active and passive recreational activities and has provided sites for two new schools in this immediate area. The re-zoning of this land in the manner set out in this submission would allow the best use of these educational, recreational, retail and community services and amenities and we consider that the suggested re-zoning of the subject site should be viewed favourably in this context.

For ease of presentation, this report outlines a number of background policies and other strategic considerations, before turning to the detailed arguments which support the recommended approach.

Indeed, as the County Council will observe, our endorsement of the re-zoning of this land is wholly consistent with current policy and our suggestion that extra development land will be required in this centre over the forthcoming plan-period accords with the *Wicklow County Development Plan 2022*.

2. The Subject Site

The subject site comprises a regularly-shaped tract which covers a total area of 7ha (17.3 ac) and which is located within Rathnew which is, in functional terms, part of Wicklow, the County Town.



Map 1: The land to which this re-zoning request relates.

Whilst the land to which this proposal relates rises in a south / south-westerly direction, it is otherwise fairly banal in town planning terms, to the degree that it contains no ecological features, cliff faces, mountain peaks, lakes or scenic watercourses, rock outcrops, heritage artefacts, national monuments, protected structures, mature stands of specimen trees, or other features of environmental or ecological significance whatsoever. The subject site is not affected by any physical planning constraint(s) which would affect its future development for residential purposes.



Aerial Image 2: The site is within Rathnew and is proximate to local amenities, as well as the extensive array of amenities in Wicklow, the County Town.

This land is used for agricultural purposes and is beside a graveyard (at its western end) and a modern business park which abuts its southern boundary. Slightly further to the south of the site is the modern Merrymeeting Neighbourhood Centre which provides local residents with an array of local services and which was initially constructed by Broomhall Estates as part of an overall social / retail infrastructure provision which was created simultaneously with nearby housing developments.



Photographs 1 & 2: The site rises from Regional Road R750 and is partly screened by existing mature vegetation which grows on its roadside perimeter.



3. Planning History

The earliest entry on the Council's electronic record (as per its website) comprises reg. 905720 when permission was granted in 1990 for a development which is described on the Council's website as:

Conversion of lean-to to slatted shed and erection of slurry pit

Two years later, under reg. ref. 927928, the Council granted planning permission for the following:

'Demolition of dwelling & erection of dormer bungalow'.

4 National and Regional Planning Policy

While the *National Planning Framework* indicates that in setting overall targets for growth, it is the pattern of development that is being targeted, rather than precise numbers, although it provides a target in the Eastern and Midlands Region of 490,000-540,000 additional people by 2040, of which 235,000 – 293,000 extra inhabitants are targeted for Dublin City and Suburbs. Objective 68 states:

'A Metropolitan Area Strategic Plan¹ may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area...'

The transitional population projections plot a growth target which, for Co. Wicklow is 155,000 - 157,500 by 2026 and 160,500 – 164,000 by 2031. The 'Roadmap' specifies that scope for 'headroom', not exceeding 25 per cent, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline, including Co. Wicklow.

The *Regional Spatial and Economic Strategy* provides a further elaboration which includes a breakdown of population projections to county level, based on the *National Planning Framework*, which should be used by councils in the formulation of the core strategies of their development plans.

5. Local Planning Policy

(i) Wicklow County Development Plan 2022

In accordance with the methodology and criteria set out in the *Regional Spatial and Economic Strategy*, all settlements with a population of over 1,000 persons (2016), have been evaluated in order to determine their appropriate categorisation in the new settlement hierarchy. A classification of 10 tiers has been devised and within this arrangement, Wicklow and Rathnew have been identified as a Level 2 Key Town in Table 3.3 Wicklow Settlement Hierarchy, which comprises an¹:

'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'.

Table 3.4 of the *Plan* notes that as total of 14,114 persons were recorded in these combined centres in the Census of Population, 2016 and establishes a population target of 18,515 persons by 2028.

(ii) Wicklow Town / Rathnew Development Plan 2013

(a) Population Projections

This *Development Plan* was prepared by Wicklow Town Council in conjunction with Wicklow County Council, in accordance with the provisions of the Planning and Development Act 2000 (as amended) and is the latest detailed statutory planning instrument for Wicklow Town and Rathnew. It observes how, in the settlement hierarchy of Co. Wicklow, Wicklow Town-Rathnew is designated a 'Large Growth Town I' and states that adopted settlement policy SS1 is relevant to this plan area:

¹ It is expected that Key Towns will have a 'growth rates of c. 35% having regard to their identification in the RSES as towns suitable for higher levels of growth'.

‘To implement the County Wicklow settlement strategy having regard to the availability of services and in particular, to direct growth into the designated metropolitan growth centre and the large, moderate and small growth towns in the Greater Dublin hinterland area’.

Under policy SS4 , the Council seeks to *‘implement the population growth targets as set out in Table 4.3’* of this instrument, with the numerical targets set out therein anticipating that Wicklow – Rathnew would expand from 19,000 persons in the year 2016 to 24,000 inhabitants in the year 2024. Section 2.2.2 of this *Development Plan* (which is entitled *‘Settlement and Population’*) states, *inter alia*, that

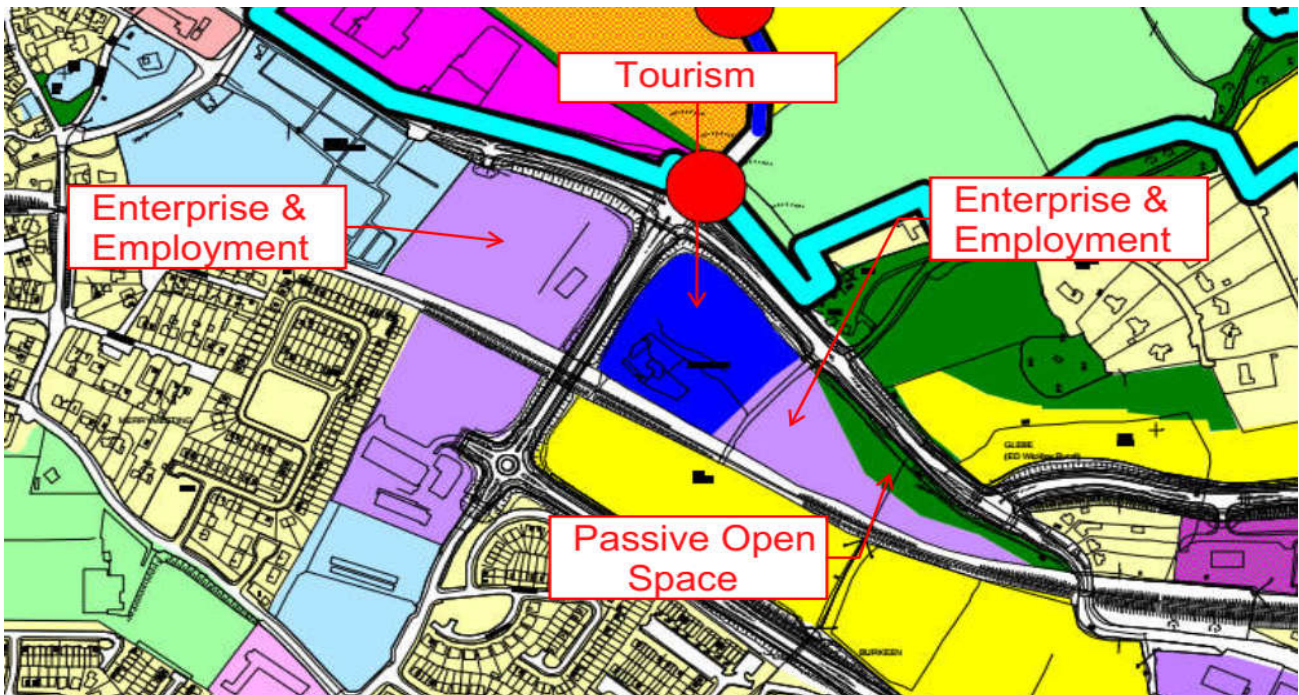
‘The settlement and population objectives for the plan flow directly from the National Spatial Strategy 2002 – 2020, the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and the Wicklow County Development Plan 2010-2016. Wicklow Town-Rathnew is within the ‘Dublin Consolidation Zone’ of the NSS and is a ‘Large Growth Town 1’ in the hinterland of the Greater Dublin Area in the RPGs and the County Development Plan. The 2011 population for the plan area is estimated at 13,4681 and the County Development Plan provides for a 2016 target population of 19,000, increasing to 24,000 in 2022’.

We hereby reproduce s.2.2.3 of this *Development Plan* (headed *‘Housing and Phasing’*) as follows:

‘In order to accommodate this potential growth in population, the plan must make provision for growth in the housing stock. This will entail ensuring that there is sufficient zoned and serviced land available for the construction of new housing. The plan provides for “headroom” or “market factor” which is ‘extra’ land that should be zoned over and above the minimum amount needed to accommodate the 2019 population target. Headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise. The basis for calculating the necessary ‘headroom’ for the plan period i.e. up to 2019, has been the housing unit requirement over the period 2019-2022’.

(b) Zoning Provisions

As shown in Map 2 below, the subject site is governed by three objectives under the *Wicklow Town / Rathnew Development Plan 2013* comprising Enterprise and Employment, Tourism and Open Space.



Map 2: The zoning objectives which apply to the land to which this submission relates.

(iii) Wicklow Town Environs Rathnew Local Area Plan 2008

This zoning arrangement was essentially carried forward from the scheme which was set out in the *Wicklow Town Environs Rathnew Local Area Plan 2008*, within which the subject site fell into two separate tracts of land comprising Action Area 2 and Action Area 3, which were detailed as follows:

'ACTION AREA 2

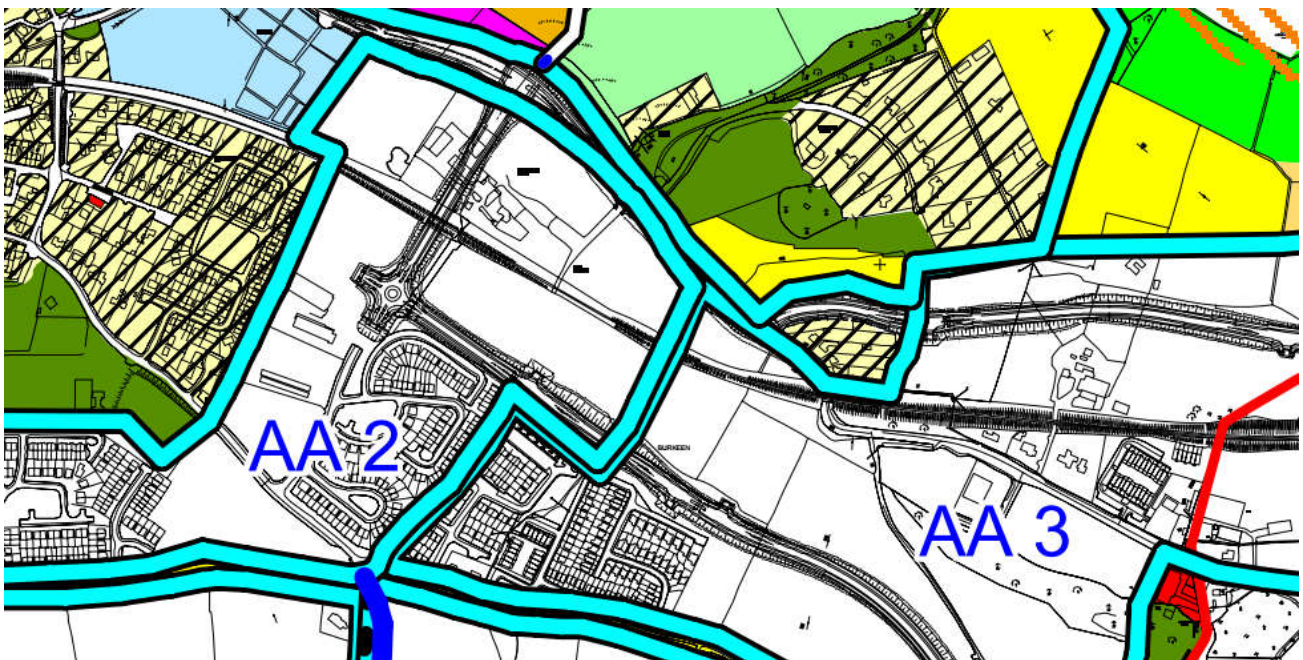
In summary, the approved Action Area Plan 2 allows for the following:

- The Development of Action Area 2 to comprise of c.20ha of Residential land, c.2ha of community and educational land, c.12ha for employment purposes, c.2ha for Hotel & Leisure facilities and c.2ha of dedicated open space. Development will result in c. 400-500 dwellings of various sizes, a school, a small neighbourhood centre, playing pitches*
- Development within AA2 is to be undertaken in 3 phases.*
- The construction of new roads, and road realignments, improvements and reservations.*
- The development of sanitary services.*

ACTION AREA 3

Development shall be in accordance with the approved Action Area Plan 3, dated 24th October 2003. In summary, the approved Action Area Plan 3 allows for the following:

- The development of c.54ha, which is made up of approximately 25ha of residential land, 4.85ha of community and educational land, 2.7ha of land for Enterprise Development, 4.4ha of Industrial land and 1.9ha for the preservation of an existing tree plantation. Within Wicklow Town Council's area, provision is made for the development of a park and ride facility with commercial development at Wicklow Train Station.*
- Development within AA3 is to be undertaken in 2 phases.*
- The construction of new roads, and road realignments, improvements and reservations.*
- The development of sanitary services'.*



Map 3: The subject site was formerly split between Action Area 2 and Action Area 3.

6. Submission

(i) Physical Planning Issues

It is immediately apparent from an examination of the Council's documents, both historical and modern, that there are no physical, functional, amenity, technical or engineering reasons as to why the subject land cannot be developed for housing purposes; this tract is not flood-prone, does not contain archaeological artefacts, does not accommodate protected structures and is not scenic in character. There are no factors which would prevent this land being developed for urban purposes.

This approach accords with the current and previous zoning arrangements which have been adopted by Wicklow County Council, all of which acknowledge the potential contribution which this land can make towards the general expansion of Wicklow Town and Rathnew. Indeed, given the current land-use arrangements in the *Wicklow Town / Rathnew Development Plan 2013*, wherein this land is earmarked for Enterprise and Employment, Tourism and Open Space activities, the Planning Authority has candidly accepted that this tract can be used as part of this settlement and the key issue thus comprises whether it should be used for housing rather than commercial or recreation purposes.

(ii) The Principle of Residential Development

There is an unquestionable need for additional housing, of all types, in the country and the principles of sustainability, along with the provisions of the *National Planning Framework*, suggest that such accommodation should be directed into existing centres, such as Rathnew, in the first place, where local services and amenities, such as playing fields and neighbourhood retail facilities, already exist.

Indeed, we have already observed how Broomhall Estates has shown a clear commitment to the expansion of Rathnew over a lengthy period (in excess of a quarter-of-a-century), not only in terms of its extensive house-building activities in this location but also in the provision of amenities and facilities, which are of a type which are used by nearby inhabitants. Such facilities would equally be available to future residents living in new housing which would be erected on the subject site and the arguments in favour of using this site for new residential development are plainly overwhelming.

Moreover, we ask the Planning Authority to note how the landowner's company, Broomhall Estates, primarily focuses on house building and there is clearly a mismatch between such activities and the zoning of the subject site. The fact that our client is not a hotelier or an industrialist is a key reason as to why this property has not been developed for the purposes identified in the zoning arrangement which is contained within the *Wicklow Town / Rathnew Development Plan 2013* or its predecessors.

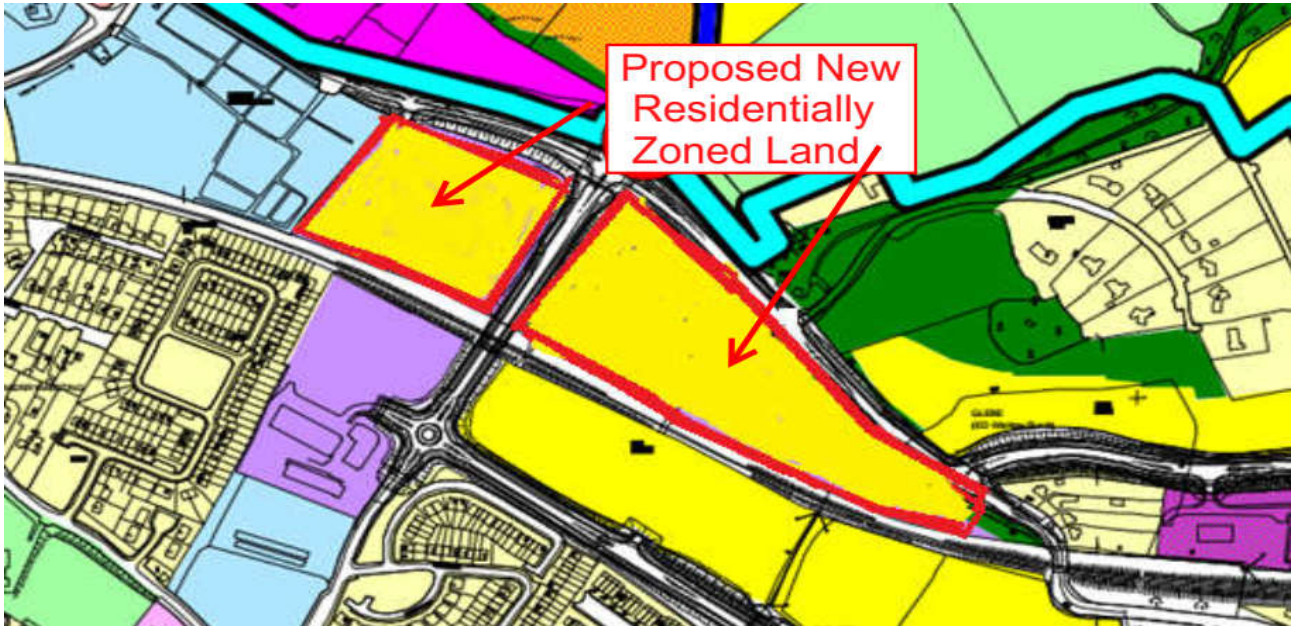
Conversely, a re-zoning of this tract so as to facilitate a housing scheme thereon is likely to result in the early development of this land for residential purposes; as the Council will be aware from its Planning Register, Broomhall Estates are not engaged in speculative conduct and this present request is prompted solely by our client's wish to construct new homes which would contribute to the supply of residential accommodation in line with the *Wicklow County Development Plan 2022*.

(iii) Housing Demand

In line with the designation of the combined settlement of Wicklow Town / Rathnew as a Level 2 Key Town in Table 3.3 of the *Wicklow County Development Plan 2022*, the Planning Authority has statutorily established a population target of 18,515 inhabitants in this centre by the year 2028 (which comprises an increase of 4,401 persons on the recorded figure from the *Census of Population, 2016*).

Although the exact number of new dwellings which are required to meet this population target is unclear, on the basis that it is largely dependent on household formation rates, which are uncertain, the issues paper which has been published for the pre-draft *Wicklow Town - Rathnew Local Area Plan* estimates that '*Wicklow Town – Rathnew will need c.1,500 new homes built between now and 2031*'.

It is our opinion that the land to which this submission relates can make a clear and indeed, a timely contribution towards the supply of residential accommodation in Wicklow Town / Rathnew and that such a scheme would wholly accord with the principles of sustainability for the reason set out above.



Map 4: The zoning of the subject site for residential purposes would be consistent with the use, or the dedication, of other lands in this area for housing development.

(iv) Infrastructure

In line with the zoning of this land for urban purposes and with the presence of residential and business / office development(s) elsewhere within this immediate area, the subject site is serviced, or is serviceable through the extension or upgrading of existing pipe infrastructure, which already caters for other neighbouring sites, to the subject land. Given our client's proven commitment to Rathnew and its experience of developing estates in this immediate area, we do not envisage that water supply, stormwater drainage or sewerage facilities would prevent this land being developed.

As shown in photograph 3 below, the site is served by existing road infrastructure, which effectively bisects this land and the local network would easily accommodate a housing scheme on this tract.



Photograph 3: The site is split by the recently completed Wicklow Town Relief Road.

7. Concluding Comment

There are no physical, functional, amenity, ecological, technical or environmental factors which would prevent this land being developed for purposes connected with the expansion of Wicklow Town – Rathnew; this is clear and indeed, this view wholly accords with the longstanding zoning history of the subject site, wherein the Council treats this tract as forming a part of this settlement.

Strategic planning policy promotes new residential development in existing centres, such as Wicklow Town / Rathnew and such new residential accommodation is greatly needed, given the housing crisis which the country is facing. However, this property cannot be developed for such activities, given that the *Wicklow Town / Rathnew Development Plan 2013* envisages that it tract would accommodate Enterprise and Employment, Tourism and Open Space. The re-zoning of this site to facilitate much-needed residential development and would accord with the principles of sustainability.



Farry Town Planning Ltd.

Farry Town Planning Ltd.

Suite 180
28 South Frederick Street
Dublin 2

Phone (01) 677 8180
Mobile 087 288 7311
vincentfarry@gmail.com

25 September 2023

Senior Executive Officer
Wicklow County Council
County Buildings
Wicklow

DRAFT RATHNEW LOCAL AREA PLAN 2024 MERRYMEETING RATHNEW CO. WICKLOW

Dear Sir or Madam

We refer to the above *Draft Local Area Plan 2024*, the preparatory stage of which is currently in progress and we confirm that we act for the owner of land in this area, Maurice and Paula Sheehy.

Mr. Sheehy is a partner in the longstanding alliance Broomhall Estates which has a long-term commitment to development in Rathnew. In this latter capacity, our client has built most of the houses in this centre and has thus facilitated the achievement of the Council's residential objectives for Rathnew. Broomhall Estates has provided land for the Town Relief Road, which opened up sites for new housing and built Saunders Road, which links this settlement with National Road N11.

Indeed, Mr. Sheehy's company has also built a neighbourhood shopping centre ('*Merrymeeting*') which provides existing and future residents of this immediate area, including the subject site, with a range of shops and facilities such as a medical centre, has donated land *gratis* for playing pitches (both soccer and Gaelic football) and has provided land on which two schools have been constructed. As these infrastructural, retail and community facilities are adjacent to the subject site the availability of services is clearly relevant to the request to re-zone this land for housing purposes.

We hereby invite Wicklow County Council to dedicate the land to which this submission relates, as depicted below, for '*New Residential*' purposes. The zoning history of this tract indicates that this property is located within the proposed built-up area which surrounds Rathnew and that it should be developed for urban purposes. The key question in this case comprises, not whether it should be zoned for new development but rather the type of activities which should be accommodated thereon.

Strategic planning policy, as set out in the *National Planning Framework* and in the *Regional Spatial Economic Strategy* seeks to promote new residential development in existing centres, such as Wicklow Town / Rathnew and we consider that the dedication of this land for housing purposes would accord with the provisions of these documents, insofar as they promote new sustainable development.

However, whilst the Council envisages the expansion of Rathnew, the land-use arrangements in the *Wicklow Town / Rathnew Development Plan 2013* envisage that this tract would accommodate Enterprise and Employment, Tourism and Open Space activities. This designation has been in existence for some time (certainly in excess of 15 years), without being realised and the preparation of the *Local Area Plan 2024* provides a suitable opportunity for this existing approach to be revisited.

Moreover, we ask the Planning Authority to note how the landowner's building firm, Broomhall Estates, primarily focuses on house building and there is clearly a mismatch between this activity and the zoning of the subject site. The fact that our client is not a hotelier or an industrialist is a key reason as to why this property has not been developed for the purposes identified in the zoning scheme which is set out in the *Wicklow Town / Rathnew Development Plan 2013* or its predecessors.

Conversely, a re-zoning of this tract so as to facilitate a housing scheme thereon is likely to result in the early development of this land for residential purposes; as the Council will be aware from its Planning Register, Broomhall Estates is not engaged in speculative conduct and this present request is prompted solely by our client's wish to construct new homes which would contribute to the supply of new residential accommodation in line with the *Wicklow County Development Plan 2022*.

Indeed, as the County Council will be aware, Broomhall Estates has been a principal developer of housing in this centre and has provided a range of non-residential features and facilities which support the expanding community in this particular settlement. Our client has constructed shops and commercial development(s), built creches and provided large swathes of public open space for both active and passive recreational activities and has provided sites for two new schools in this local area. The re-zoning of this land in the manner set out in this submission would allow the best use of these educational, recreational, retail and community services and amenities and we consider that the suggested zoning of the subject site should be viewed favourably in this particular context.

Yours faithfully



Farry Town Planning Ltd.

Farry Town Planning Ltd.

Suite 180
28 South Frederick Street
Dublin 2

Phone (01) 677 8180
Mobile 087 288 7311
vincentfarry@gmail.com

ZONING SUBMISSION ON A TRACT OF LAND AT MERRYMEETING RATHNEW CO. WICKLOW

**RE-ZONING REQUEST REPAIRED BY
FARRY TOWN PLANNING LTD.
ON BEHALF OF
MAURICE AND PAULA SHEEHY**

Index to Report

- 1. Introduction**
- 2. The Subject Site**
- 3. Select Planning History**
- 4. National and Regional Planning Policy**
- 5. Local Planning Policy**
 - (i) Wicklow County Development Plan 2022
 - (ii) Wicklow Town / Rathnew Development Plan 2013
 - (a) Population Projections
 - (b) Zoning Provisions
 - (iii) Wicklow Town Environs Rathnew Local Area Plan 2008
- 6. Submission**
 - (i) Physical Planning Issues
 - (ii) The Principle of Residential Development
 - (iii) Housing Demand
 - (iv) Infrastructure
- 7. Concluding Comments**

1. Introduction

This planning report has been drafted on behalf of Maurice and Paula Sheehy and has been prepared for lodgement with the Council, as the planning authority for Co. Wicklow, in the context of its forthcoming *Draft Rathnew Local Area Plan*, which will be placed on public exhibition pursuant to the requirements of planning law. The Planning Authority is now accepting third-party comments on the contents of this document and the present report has been prepared in this particular context.

This submission invites the Planning Authority to re-zone certain land on the edge of the built-up area which surrounds Rathnew for residential development purposes. The Council already considers that this land is located within the development envelope which encircles this settlement and the key issue which arises comprises the best use of this site, in terms of the growth of Rathnew.



Aerial Image 1: Wicklow / Rathnew comprises one of a number of coastal centres which are located to the south of the Capital and comprises a major Town.

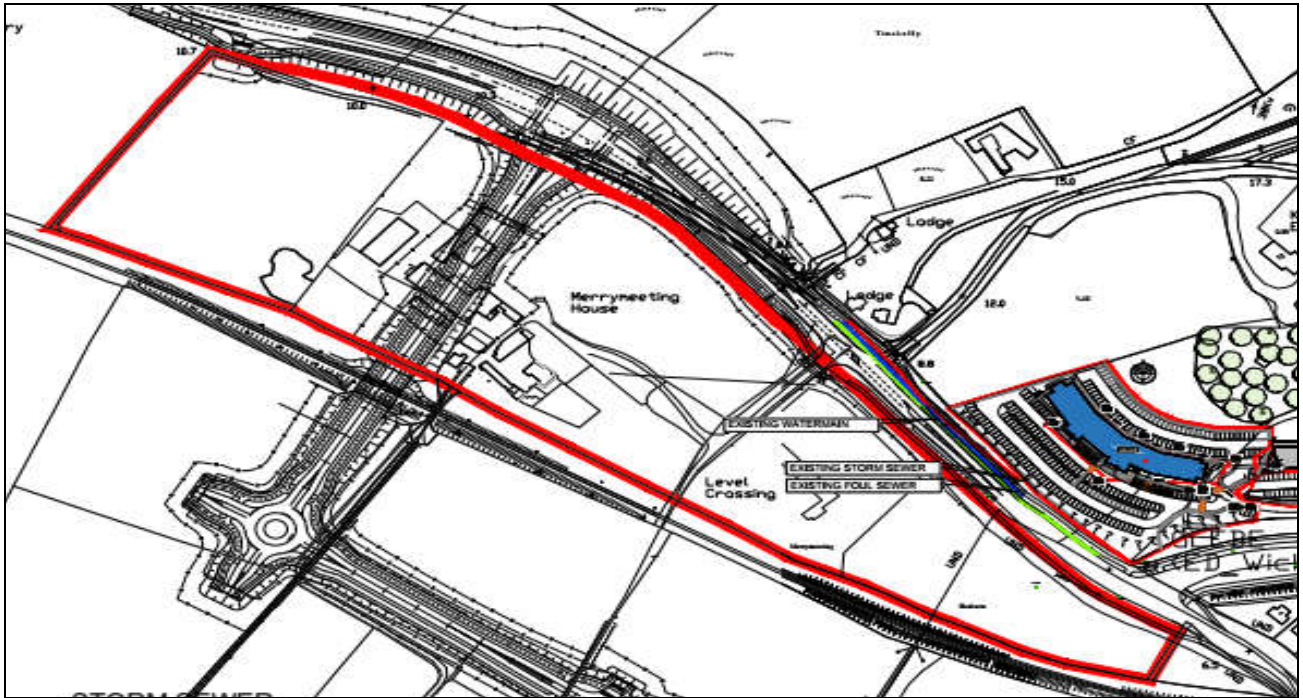
Indeed, as the County Council will be aware, Broomhall Estates has been a principal developer of new housing in this centre and has provided a range of non-residential features and facilities which support the expanding community in this particular settlement. Our client has constructed shops and commercial development(s), built creches, created large swathes of public open space for both active and passive recreational activities and has provided sites for two new schools in this immediate area. The re-zoning of this land in the manner set out in this submission would allow the best use of these educational, recreational, retail and community services and amenities and we consider that the suggested re-zoning of the subject site should be viewed favourably in this context.

For ease of presentation, this report outlines a number of background policies and other strategic considerations, before turning to the detailed arguments which support the recommended approach.

Indeed, as the County Council will observe, our endorsement of the re-zoning of this land is wholly consistent with current policy and our suggestion that extra development land will be required in this centre over the forthcoming plan-period accords with the *Wicklow County Development Plan 2022*.

2. The Subject Site

The subject site comprises a regularly-shaped tract which covers a total area of 7ha (17.3 ac) and which is located within Rathnew which is, in functional terms, part of Wicklow, the County Town.



Map 1: The land to which this re-zoning request relates.

Whilst the land to which this proposal relates rises in a south / south-westerly direction, it is otherwise fairly banal in town planning terms, to the degree that it contains no ecological features, cliff faces, mountain peaks, lakes or scenic watercourses, rock outcrops, heritage artefacts, national monuments, protected structures, mature stands of specimen trees, or other features of environmental or ecological significance whatsoever. The subject site is not affected by any physical planning constraint(s) which would affect its future development for residential purposes.



Aerial Image 2: The site is within Rathnew and is proximate to local amenities, as well as the extensive array of amenities in Wicklow, the County Town.

This land is used for agricultural purposes and is beside a graveyard (at its western end) and a modern business park which abuts its southern boundary. Slightly further to the south of the site is the modern Merrymeeting Neighbourhood Centre which provides local residents with an array of local services and which was initially constructed by Broomhall Estates as part of an overall social / retail infrastructure provision which was created simultaneously with nearby housing developments.



Photographs 1 & 2: The site rises from Regional Road R750 and is partly screened by existing mature vegetation which grows on its roadside perimeter.



3. Planning History

The earliest entry on the Council's electronic record (as per its website) comprises reg. 905720 when permission was granted in 1990 for a development which is described on the Council's website as:

Conversion of lean-to to slatted shed and erection of slurry pit

Two years later, under reg. ref. 927928, the Council granted planning permission for the following:

'Demolition of dwelling & erection of dormer bungalow'.

4 National and Regional Planning Policy

While the *National Planning Framework* indicates that in setting overall targets for growth, it is the pattern of development that is being targeted, rather than precise numbers, although it provides a target in the Eastern and Midlands Region of 490,000-540,000 additional people by 2040, of which 235,000 – 293,000 extra inhabitants are targeted for Dublin City and Suburbs. Objective 68 states:

'A Metropolitan Area Strategic Plan¹ may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area...'

The transitional population projections plot a growth target which, for Co. Wicklow is 155,000 - 157,500 by 2026 and 160,500 – 164,000 by 2031. The 'Roadmap' specifies that scope for 'headroom', not exceeding 25 per cent, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline, including Co. Wicklow.

The *Regional Spatial and Economic Strategy* provides a further elaboration which includes a breakdown of population projections to county level, based on the *National Planning Framework*, which should be used by councils in the formulation of the core strategies of their development plans.

5. Local Planning Policy

(i) Wicklow County Development Plan 2022

In accordance with the methodology and criteria set out in the *Regional Spatial and Economic Strategy*, all settlements with a population of over 1,000 persons (2016), have been evaluated in order to determine their appropriate categorisation in the new settlement hierarchy. A classification of 10 tiers has been devised and within this arrangement, Wicklow and Rathnew have been identified as a Level 2 Key Town in Table 3.3 Wicklow Settlement Hierarchy, which comprises an¹:

'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'.

Table 3.4 of the *Plan* notes that as total of 14,114 persons were recorded in these combined centres in the Census of Population, 2016 and establishes a population target of 18,515 persons by 2028.

(ii) Wicklow Town / Rathnew Development Plan 2013

(a) Population Projections

This *Development Plan* was prepared by Wicklow Town Council in conjunction with Wicklow County Council, in accordance with the provisions of the Planning and Development Act 2000 (as amended) and is the latest detailed statutory planning instrument for Wicklow Town and Rathnew. It observes how, in the settlement hierarchy of Co. Wicklow, Wicklow Town-Rathnew is designated a 'Large Growth Town I' and states that adopted settlement policy SS1 is relevant to this plan area:

¹ It is expected that Key Towns will have a 'growth rates of c. 35% having regard to their identification in the RSES as towns suitable for higher levels of growth'.

‘To implement the County Wicklow settlement strategy having regard to the availability of services and in particular, to direct growth into the designated metropolitan growth centre and the large, moderate and small growth towns in the Greater Dublin hinterland area’.

Under policy SS4 , the Council seeks to *‘implement the population growth targets as set out in Table 4.3’* of this instrument, with the numerical targets set out therein anticipating that Wicklow – Rathnew would expand from 19,000 persons in the year 2016 to 24,000 inhabitants in the year 2024. Section 2.2.2 of this *Development Plan* (which is entitled *‘Settlement and Population’*) states, *inter alia*, that

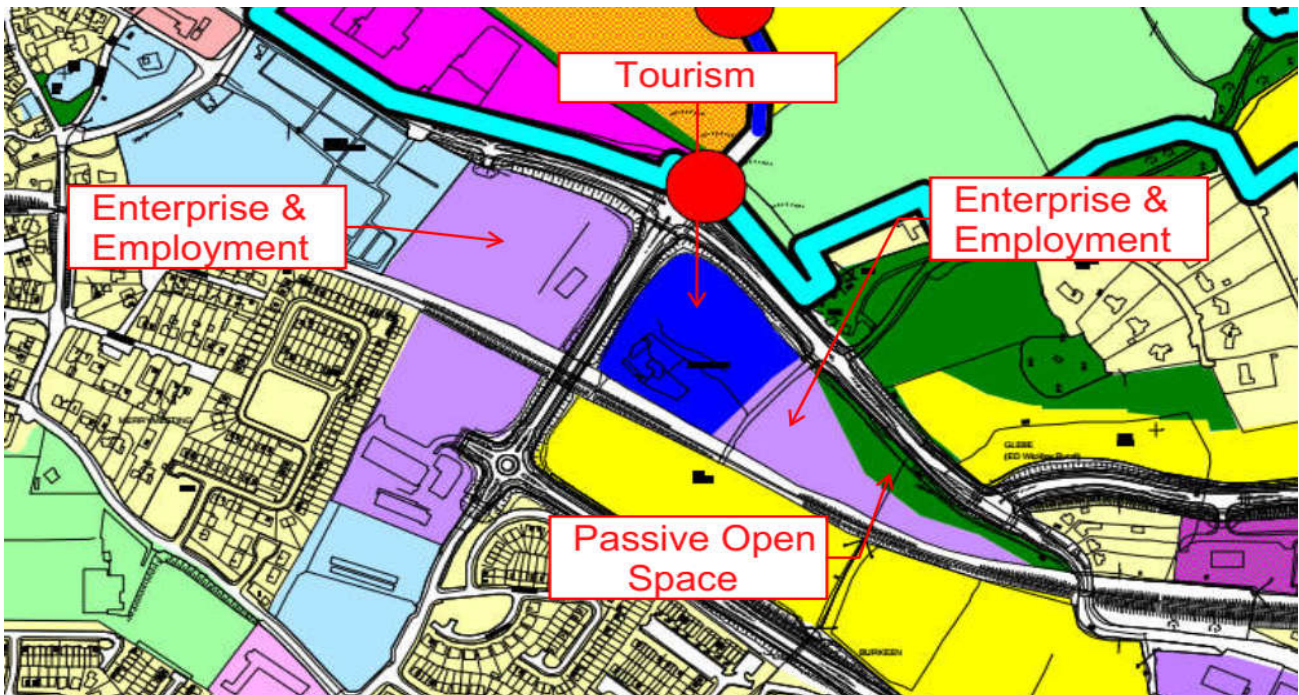
‘The settlement and population objectives for the plan flow directly from the National Spatial Strategy 2002 – 2020, the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and the Wicklow County Development Plan 2010-2016. Wicklow Town-Rathnew is within the ‘Dublin Consolidation Zone’ of the NSS and is a ‘Large Growth Town 1’ in the hinterland of the Greater Dublin Area in the RPGs and the County Development Plan. The 2011 population for the plan area is estimated at 13,4681 and the County Development Plan provides for a 2016 target population of 19,000, increasing to 24,000 in 2022’.

We hereby reproduce s.2.2.3 of this *Development Plan* (headed *‘Housing and Phasing’*) as follows:

‘In order to accommodate this potential growth in population, the plan must make provision for growth in the housing stock. This will entail ensuring that there is sufficient zoned and serviced land available for the construction of new housing. The plan provides for “headroom” or “market factor” which is ‘extra’ land that should be zoned over and above the minimum amount needed to accommodate the 2019 population target. Headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise. The basis for calculating the necessary ‘headroom’ for the plan period i.e. up to 2019, has been the housing unit requirement over the period 2019-2022’.

(b) Zoning Provisions

As shown in Map 2 below, the subject site is governed by three objectives under the *Wicklow Town / Rathnew Development Plan 2013* comprising Enterprise and Employment, Tourism and Open Space.



Map 2: The zoning objectives which apply to the land to which this submission relates.

(iii) Wicklow Town Environs Rathnew Local Area Plan 2008

This zoning arrangement was essentially carried forward from the scheme which was set out in the *Wicklow Town Environs Rathnew Local Area Plan 2008*, within which the subject site fell into two separate tracts of land comprising Action Area 2 and Action Area 3, which were detailed as follows:

'ACTION AREA 2

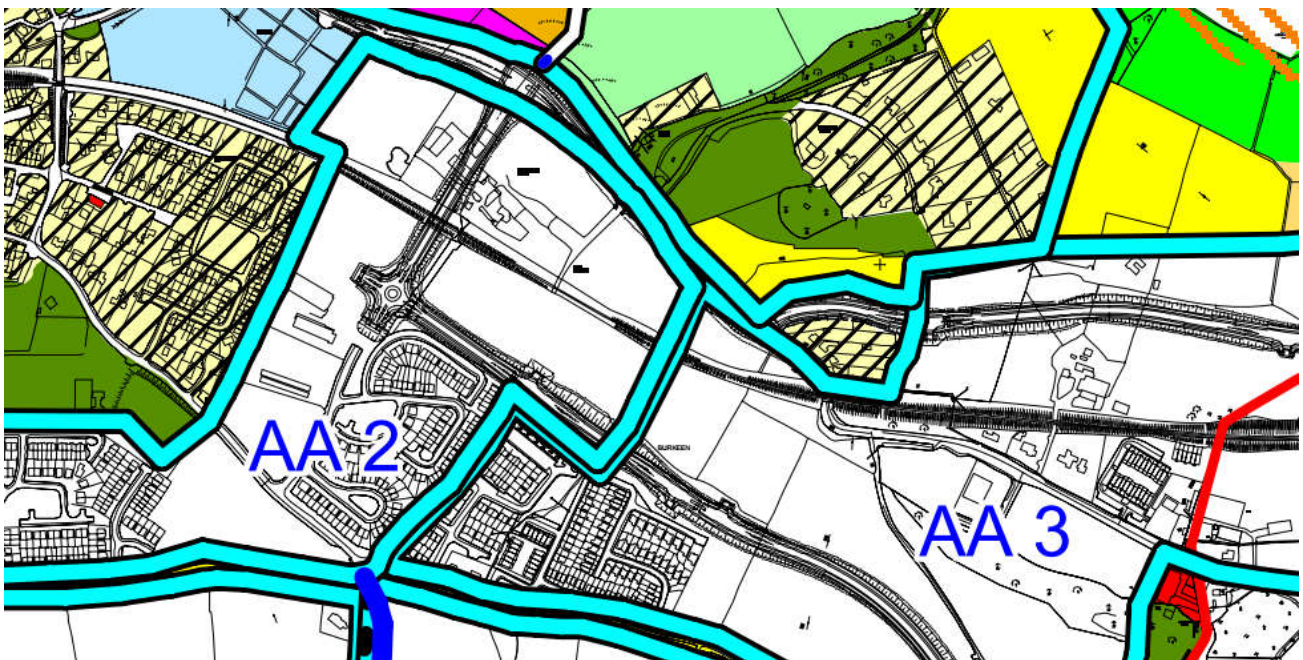
In summary, the approved Action Area Plan 2 allows for the following:

- The Development of Action Area 2 to comprise of c.20ha of Residential land, c.2ha of community and educational land, c.12ha for employment purposes, c.2ha for Hotel & Leisure facilities and c.2ha of dedicated open space. Development will result in c. 400-500 dwellings of various sizes, a school, a small neighbourhood centre, playing pitches*
- Development within AA2 is to be undertaken in 3 phases.*
- The construction of new roads, and road realignments, improvements and reservations.*
- The development of sanitary services.*

ACTION AREA 3

Development shall be in accordance with the approved Action Area Plan 3, dated 24th October 2003. In summary, the approved Action Area Plan 3 allows for the following:

- The development of c.54ha, which is made up of approximately 25ha of residential land, 4.85ha of community and educational land, 2.7ha of land for Enterprise Development, 4.4ha of Industrial land and 1.9ha for the preservation of an existing tree plantation. Within Wicklow Town Council's area, provision is made for the development of a park and ride facility with commercial development at Wicklow Train Station.*
- Development within AA3 is to be undertaken in 2 phases.*
- The construction of new roads, and road realignments, improvements and reservations.*
- The development of sanitary services'.*



Map 3: The subject site was formerly split between Action Area 2 and Action Area 3.

6. Submission

(i) Physical Planning Issues

It is immediately apparent from an examination of the Council's documents, both historical and modern, that there are no physical, functional, amenity, technical or engineering reasons as to why the subject land cannot be developed for housing purposes; this tract is not flood-prone, does not contain archaeological artefacts, does not accommodate protected structures and is not scenic in character. There are no factors which would prevent this land being developed for urban purposes.

This approach accords with the current and previous zoning arrangements which have been adopted by Wicklow County Council, all of which acknowledge the potential contribution which this land can make towards the general expansion of Wicklow Town and Rathnew. Indeed, given the current land-use arrangements in the *Wicklow Town / Rathnew Development Plan 2013*, wherein this land is earmarked for Enterprise and Employment, Tourism and Open Space activities, the Planning Authority has candidly accepted that this tract can be used as part of this settlement and the key issue thus comprises whether it should be used for housing rather than commercial or recreation purposes.

(ii) The Principle of Residential Development

There is an unquestionable need for additional housing, of all types, in the country and the principles of sustainability, along with the provisions of the *National Planning Framework*, suggest that such accommodation should be directed into existing centres, such as Rathnew, in the first place, where local services and amenities, such as playing fields and neighbourhood retail facilities, already exist.

Indeed, we have already observed how Broomhall Estates has shown a clear commitment to the expansion of Rathnew over a lengthy period (in excess of a quarter-of-a-century), not only in terms of its extensive house-building activities in this location but also in the provision of amenities and facilities, which are of a type which are used by nearby inhabitants. Such facilities would equally be available to future residents living in new housing which would be erected on the subject site and the arguments in favour of using this site for new residential development are plainly overwhelming.

Moreover, we ask the Planning Authority to note how the landowner's company, Broomhall Estates, primarily focuses on house building and there is clearly a mismatch between such activities and the zoning of the subject site. The fact that our client is not a hotelier or an industrialist is a key reason as to why this property has not been developed for the purposes identified in the zoning arrangement which is contained within the *Wicklow Town / Rathnew Development Plan 2013* or its predecessors.

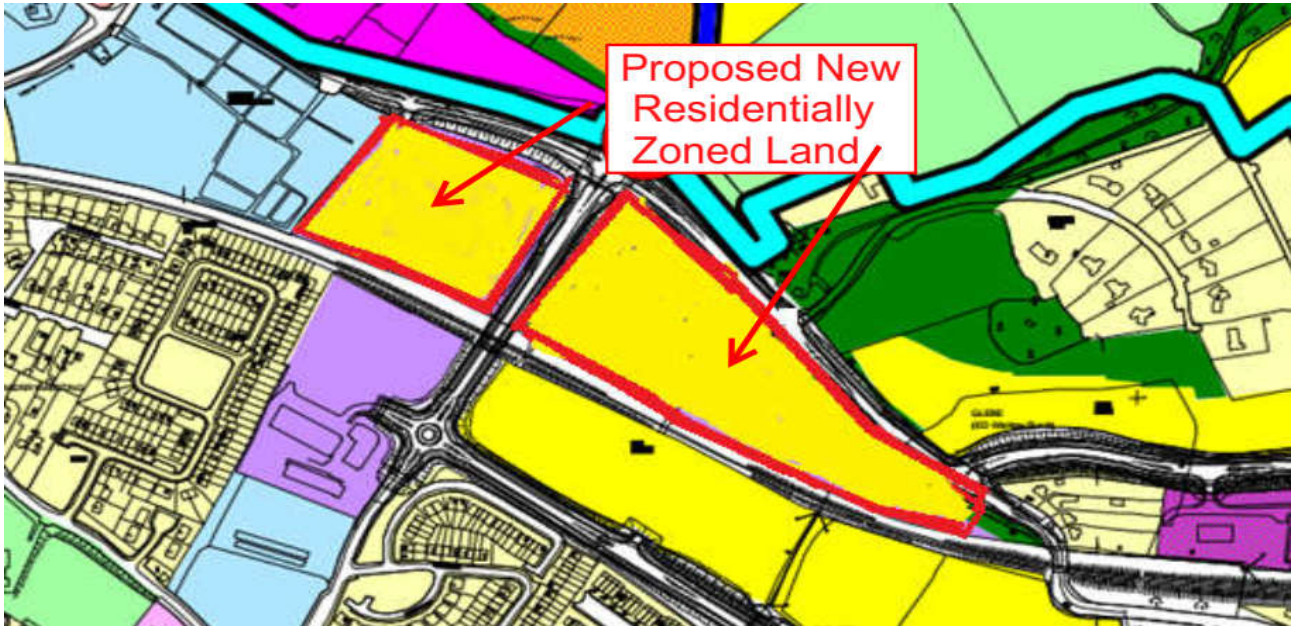
Conversely, a re-zoning of this tract so as to facilitate a housing scheme thereon is likely to result in the early development of this land for residential purposes; as the Council will be aware from its Planning Register, Broomhall Estates are not engaged in speculative conduct and this present request is prompted solely by our client's wish to construct new homes which would contribute to the supply of residential accommodation in line with the *Wicklow County Development Plan 2022*.

(iii) Housing Demand

In line with the designation of the combined settlement of Wicklow Town / Rathnew as a Level 2 Key Town in Table 3.3 of the *Wicklow County Development Plan 2022*, the Planning Authority has statutorily established a population target of 18,515 inhabitants in this centre by the year 2028 (which comprises an increase of 4,401 persons on the recorded figure from the *Census of Population, 2016*).

Although the exact number of new dwellings which are required to meet this population target is unclear, on the basis that it is largely dependent on household formation rates, which are uncertain, the issues paper which has been published for the pre-draft *Wicklow Town - Rathnew Local Area Plan* estimates that '*Wicklow Town - Rathnew will need c.1,500 new homes built between now and 2031*'.

It is our opinion that the land to which this submission relates can make a clear and indeed, a timely contribution towards the supply of residential accommodation in Wicklow Town / Rathnew and that such a scheme would wholly accord with the principles of sustainability for the reason set out above.



Map 4: The zoning of the subject site for residential purposes would be consistent with the use, or the dedication, of other lands in this area for housing development.

(iv) Infrastructure

In line with the zoning of this land for urban purposes and with the presence of residential and business / office development(s) elsewhere within this immediate area, the subject site is serviced, or is serviceable through the extension or upgrading of existing pipe infrastructure, which already caters for other neighbouring sites, to the subject land. Given our client's proven commitment to Rathnew and its experience of developing estates in this immediate area, we do not envisage that water supply, stormwater drainage or sewerage facilities would prevent this land being developed.

As shown in photograph 3 below, the site is served by existing road infrastructure, which effectively bisects this land and the local network would easily accommodate a housing scheme on this tract.



Photograph 3: The site is split by the recently completed Wicklow Town Relief Road.

7. Concluding Comment

There are no physical, functional, amenity, ecological, technical or environmental factors which would prevent this land being developed for purposes connected with the expansion of Wicklow Town – Rathnew; this is clear and indeed, this view wholly accords with the longstanding zoning history of the subject site, wherein the Council treats this tract as forming a part of this settlement.

Strategic planning policy promotes new residential development in existing centres, such as Wicklow Town / Rathnew and such new residential accommodation is greatly needed, given the housing crisis which the country is facing. However, this property cannot be developed for such activities, given that the *Wicklow Town / Rathnew Development Plan 2013* envisages that it tract would accommodate Enterprise and Employment, Tourism and Open Space. The re-zoning of this site to facilitate much-needed residential development and would accord with the principles of sustainability.



Farry Town Planning Ltd.