



Draft Wicklow Town – Rathnew LAP Submission - Report

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**Draft Wicklow Town – Rathnew
Local Area Plan 2025 Submission**

On behalf of

ARDALE

Ardale Property Group

November 2024



Planning & Development Consultants

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1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin have been instructed by our client, **Ardale Property Group, Unit B4, Oakfield Industrial Estate, Ninth Lock Road, Clondalkin, D22 XS28**, to make this submission on the Draft Wicklow- Rathnew Local Area Plan 2025.

The Draft Wicklow – Rathnew Local Area Plan 2025 is on public display from 9th October 2024 – 20th November 2024, and submissions on the Plan are welcomed until 20th November 2024. We note that this submission is lodged to Wicklow County Council through the online consultation portal before the submission deadline of midnight 20th November 2024.

This submission has been prepared to comment on, respond to, and suggest changes to specific objectives assigned to our client’s landholding at Tinakilly, to support the future development of the lands in a manner which supports the proper planning and sustainable development of the site. Our client generally supports the zoning of the site for residential use within the Wicklow – Rathnew Local Area Plan 2025.

Our client welcomes the opportunity to provide a submission on the Draft Wicklow – Rathnew Local Area Plan 2025, and we trust that our input will be considered prior to the adoption of the full final Plan.

1.1 Client’s Background

We refer to the following company statement prepared by Ardale Property:

Ardale is an established Irish development company. At our core, we are focused on crafting schemes into new communities to be proud of, with new homes and employment centres and supporting infrastructure such as cycleways, parks and playgrounds as well as childcare and nearby neighbourhood retail.

We use our expertise and knowledge to create a strategy around each landholding focused on delivering a masterplan that all stakeholders in a project from the Local Authority to the local community can get behind. Early-stage delivery of infrastructure such as new roads, retail, community, and sports facilities are a key component of our approach, which helps us bring new communities to life.

Ardale are hugely active in County Wicklow, with housing schemes such as Heatherside in Arklow (200 units), Tinakilly Park in Rathnew (365 units), Clermont Grove (45 units) and Mariners Point (74 units) fully underway. Other notable recent developments include the delivery of the new Retail Centre in Rathnew anchored by Aldi. Several schemes are also progressing to pre-planning or planning stage with the Council including the Newcastle lands. These other schemes should bring forward over 500 new housing units across a number of superb high quality housing schemes, subject to planning.

1.2 Client’s Landholding and Development Context

Our client’s landholding to which this submission relates is located on lands at Tinakilly, Rathnew, Co. Wicklow. For the benefit of Wicklow County Council, the subject lands are now shown on figure 1 below, outlined in red:





Figure 1 – Applicants Landholding subject of this submission (Outlined in red)

It is noted to Wicklow County Council that our client also has an extensive residential zoned landholding in the area immediately surrounding the subject submission lands, highlighted in blue on Figure 1, all of which is being developed currently under the following permissions:

- **WCC Reg Ref. 21/1333** – Permission granted 18th of April 2022 for amendments to permitted development WCC Reg. Ref. 16/1444 to replace 36 no. units with 41 no. houses. It is clear from the Figure 1 above that this permission has been implemented and is nearing completion.
- **WCC Reg Ref. 22/837** - Permission was granted on the 19 October 2022 for a Large-Scale Residential Development. The proposed development will consist of amendments to permitted development Reg. Ref 17/219 (ABP Ref. 301261-18) for 271 units, as amended by permission granted under Reg. Ref 20/1000 and Reg Ref 21/411, to include for amendments to the layout, changes to house designs/types and 94 additional residential units (of which 84 no. units were refused under Reg. Ref 17/219 / ABP Ref 301261-18) The total number of units will consist of 365 no. units comprising 98 no. units permitted under Reg. ref 17/219 (ABP Ref 301261-18) as amended by permission granted under Reg. Ref 20/1000 and 21/411 (currently under construction) and 267 no. units proposed under the subject application. It is clear from the Figure 1 above that this permission has been implemented and is nearing completion.

It is clear that development on the subject lands, outlined in red on figure 1, will consolidate the development of the Tinakilly lands once a permission has been granted and implemented. Our client has previously lodged an application for development on the subject lands as follows:

- **WCC Reg Ref. 23/60219** - Construction of 352 no. residential units (b) The proposed development will connect to the Tinakilly Park residential development and Rathnew Village via a new section of the Rathnew Inner Relief Road. The proposed road will join the



constructed/under construction elements permitted under WCC Ref. 17/219/ ABP Ref. PL27.301261 and amended under WCC Ref. 22/837 to the south with a section of the link road to the northwest of the site at the R761 roundabout in Rathnew granted under WCC Ref. 21/1333.

Application Reg Ref. 23/60219 was granted permission by Wicklow County Council on the 2nd February 2024. Subsequently, this permission was appealed to An Bord Pleanála by 5 no. 3rd Party Appellants (ABP Ref. 319137-24). An Bord Pleanála subsequently overturned the decision of the Planning Authority, and refused permission for development on the subject lands on the 2nd October 2024 for 2 no. reasons as follows:

1. Having regard, to the legislative preconditions which apply to Large Scale Residential Development (LRD) as set out in Section 32A(1) of the Planning and Development Act 2000, as amended, to the nature of the appeal, which is an LRD appeal against a decision of the Planning Authority that relates to an application for permission to which Section 32A(1) applies (Section 2 of the Act refers), and to the totality of documentation on file, including the submissions from third parties and the submission from the first party received by An Bord Pleanála on 08/07/2024 which states that ‘as of today, there is nothing in any county plan or local area plan that is in force to describe for Rathnew any objectives for zoning of land’, it is considered that no statutory zoning currently applies to the subject site. In this context, the proposed development is not consistent with the legislative preconditions for an LRD application, insofar as it is not on land the zoning of which facilitates its use for the purposes proposed in the application. In this context, the Board is precluded from granting permission for the proposed development.
2. Having regard to the relevant provisions of the Wicklow County Development Plan 2022-2028, which notes that a new Local Area Plan will be made for Wicklow Town – Rathnew (with this future LAP listed as first in the order of priority of plans to be made – Section 3.5 of the Plan refers) and to the associated Core Strategy Table A: LAP Towns, which refers to a surplus of previously zoned land in this settlement and notes that ‘the remaining surplus will be addressed in next LAP’, it is considered that the proposed development would be premature pending the making of a statutory local area plan for this overall settlement and which will confirm the final appropriate quantum and location of residential zoned land. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

It is clear from the above refusal reasons listed by An Bord Pleanála that the development on the subject lands was refused permission on the basis that the Wicklow Town – Rathnew Development Plan 2013-2019 was considered expired, and had not been extended or replaced by Wicklow County Council. This refusal arose from a strategic planning issue, and not an issue with the actual scheme design. The scheme permitted by Wicklow County Council under WCC Reg Ref. 23/60219 (Refused by ABP under Ref. 319137-24) is now included below for convenience:





Figure 2 – Site Layout (WCC Ref. 23/60219 – ABP. 319137).

The site layout shown on figure 2 above was subject to extensive pre planning consultations with Wicklow County Council, and a Further information request prior to receipt of a grant of permission from Wicklow County Council, which was overturned and refused by An Bord Pleanála, on the basis that the Wicklow Town – Rathnew Development Plan 2013-2019 had not been extended or replaced by Wicklow County Council. It is submitted that the above site layout represents the most sustainable form of development on the applicants landholding.



2 Draft Wicklow – Rathnew Local Area Plan 2025 – Submission

Our client, Ardale Property Group, now wish to comment on the following item as included within the Draft Wicklow Town – Rathnew Local Area Plan 2025:

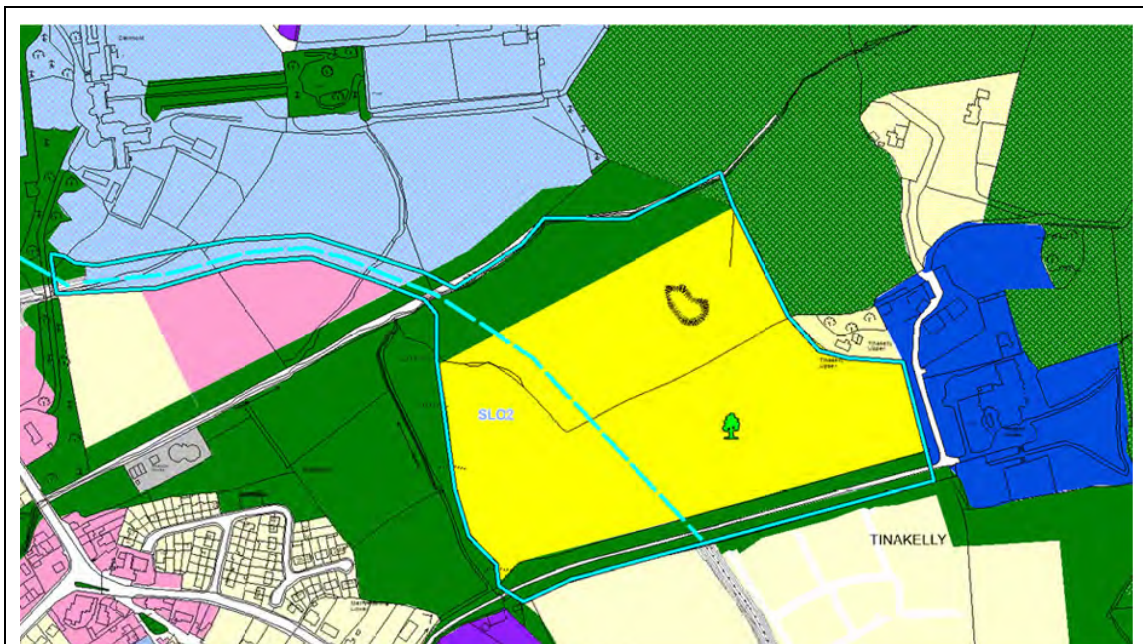
Section 11.5 Specific Local Objectives (SLO) - SLO 2 – Tinakilly/ Newrath

2.1 Overview of SLO 2 – Tinakilly/ Newrath

The Draft Wicklow Town – Rathnew Local Area Plan includes a number of Specific Local Objectives for parcels of land, with an objective:

‘to guide developers as to the aspirations of the plan regarding the development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands, or where the lands are zoned for ‘mixed use’ to give more detail on the development objective of these lands. A masterplan may be required to be agreed prior to the submission of a planning application’.

Our client’s landholding, shown as the ‘subject lands’ on figure 1 in this submission, is included as SLO 2 – Tinakilly/ Newrath in the Draft Wicklow Town – Rathnew Local Area Plan as follows:



Map SLO 2

This SLO is located in the townlands of Tinakilly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, and this Local Area Plan and the following:

- Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area, and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road.



- Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and
- Retention of the ‘fairy tree’ at its current location (shown with green tree symbol on map SLO 2)

A Concept Plan for the development of the SLO 2 Tinakilly/ Newrath lands is also included within the Draft Wicklow Town - Rathnew Local Area Plan 2025 as follows:

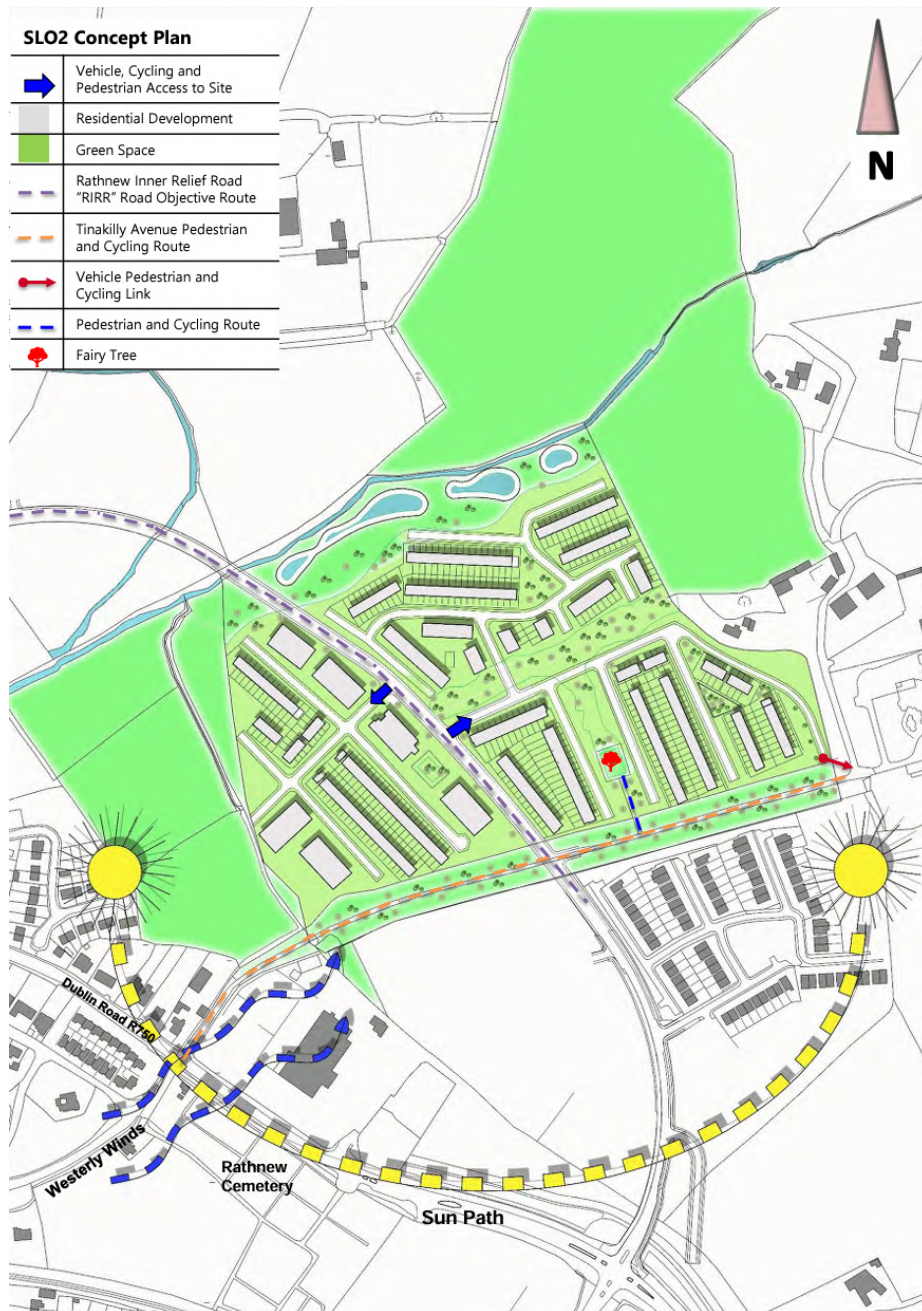


Figure 3 – SLO 2 Tinakilly/ Newrath Concept Plan





2.2 Ardale Property Group Comment on SLO 2 – Tinakilly/ Newrath Objectives.

Ardale Property Group wish to express their support for the zoning of their landholding at Tinakilly as New Residential (RN1), Natural Areas (oS2) and Open Space (OS1).

Within the lifetime of the proposed plan It is our clients intention to:

1. Fully deliver the Rathnew Inner Relief Road
2. Complete the full development of the Tinakilly Lands within their landholding.

This aligns our client fully with the two primary objectives of the proposed plan for the lands.

The focus therefore of this submission is to highlight, and seek amendment to, a number of proposed specific development objectives that we feel may obstruct, confuse and ultimately delay the full delivery of the Rathnew Inner Relief Road and the development of the Tinakilly Lands. The amendments sought will support not detract from the two primary objectives for the lands.

SLO 2 Objective:

Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area, and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road.

Ardale Property Group Comment:

Rationale for provision of the Rathnew Inner Relief Road:

The bypassing of Rathnew has been a primary objective of Wicklow County Council for over 30 years as far back as the 1994 Wicklow Environs Plan. That plan highlighted the need to not only take traffic out of Wicklow Town via a Port Relief Road but also to create a bypass around Rathnew to ensure that the Port Relief Road did not simply transfer Wicklow Towns congestion to Rathnew.

As matters stand, the Port Relief Road is constructed, as is another Town Relief Road which facilitated the development of huge amounts of land between Rathnew and Wicklow Town. Both of these roads now deposit the traffic from Wicklow Town to the Merrymeetings Junction where that traffic creates massive congestion within Rathnew Village. The importance of the completion of the Rathnew Inner Relief Road in this context cannot be understated. This is reflected in the ‘Local Transport Assessment’ carried out as part of the preparation of the Draft Plan.

It is also clear that the delivery of the Relief Road during the lifetime of the plan is one of the key objectives, especially in the context of Rathnew Village. The delivery of the road is listed as an objective throughout the draft Plan, namely within the ‘Rathnew Village Centre strategy Objectives’ and ‘Transportation Objectives’ for the plan area as follows:

- **WTR43 - To improve pedestrian movement around the centre by facilitating the provision of pedestrian crossings at appropriate locations, including across the Glenealy Road to the ‘Old Village’ and across the Rathnew Inner Relief Road (from the VC zoning) to the Wicklow County Campus**
- **WTR45 - To facilitate the delivery of the remainder of the Rathnew Inner Relief Road.**





- **WTR75 - Support the implementation of the recommendations of the Transport Assessment with regard to the delivery of new regional/distributor roads and road improvements, including:**
 - **The completion of the Rathnew Inner Relief Road including reconfiguration of road network between Junction 16 and Rathnew Village to re-direct Wicklow Town-bound flows away from the Aldi-Tinakilly traffic lights and the village centre;**
 - A new link road between Tighe’s Avenue and the R752 (for Glenealy – Rathdrum bound traffic);
 - The improvement of the road connections between the Wicklow Town – Rathnew and M11 Junctions 17 and 18, namely the L-1099 and R751, and;
 - To facilitate and support the improvement of the operational efficiency of the regional / local road network to ensure that the M11 is not utilised as a ‘local’ route for trips internal to the settlement.

The completed Transport Assessment, published as Appendix 1 of the Draft Wicklow Town – Rathnew Local Area Plan 2025, also outlines the importance of the delivery of the Rathnew Inner Relief Road during the lifetime of the Plan as follows:

‘It is essential that this route is completed during the lifetime of this LAP, as traffic issues arising on the R772 and R750 between Junction 16 and Wicklow Town as already described in this report must be addressed’.

Given the context outlined above, our client was surprised to see the rationale for the Road within the ‘SLO 2 Objective’ very much downplaying its strategic importance.

Under the objective the ‘Provision of the RIRR’ is to:

1. *facilitate access to new developments from the existing road network*
2. *to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area*
3. *and to achieve good traffic circulation in the area*

Clearly the primary purpose of the Relief Road as envisaged as far back as the 1994 Plan is to alleviate the congestion caused by the traffic coming from Wicklow Town along both the Port Relief Road and the Town Access route. This traffic is what predominantly causes congestion at Rathnew village.

Ardale have a number of concerns as follows:

1. The issue with WCC not acknowledging the strategic importance of the road, albeit only within the ‘SLO 2’ part of the draft plan, is the potential knock on impact on WCC’s ability to secure ‘State’ funding to support the development of the road as envisaged under ‘Appendix 3 – Infrastructure Delivery Schedule and Implementation’. To develop the road this funding will be required.
2. Ardale also note that the benefit of the RIRR to facilitate development above and beyond the Tinakilly lands is not reflected in the plan. The road appears to be tied solely to development on the SLO2 lands, despite its opening up of new road access to Wicklow County Campus lands at Clermont and newly zoned village centre lands as well as facilitating wider development in Wicklow Town-Rathnew that could otherwise be stymied by the increasing congestion within Rathnew Village. Again understating the roads importance will not assist in securing State funding.
3. It is noted that ‘developer’ is a noted funding source for the road with Appendix 3. It is submitted that the cost of the provision of the road should not fall only on the ‘developer’ of the Tinakilly



Lands but also the ‘developer’ of the Village Centre and Wicklow County Campus. Additional contributions linked to these lands will reduce the level of ‘State’ funding required.

All of these points are important in the wider context of WCC securing ‘State’ funding as envisaged.

The area of lands zoned Village Centre, Existing Residential, Wicklow County Campus and Employment that will be unlocked for development by the provision of the Rathnew Inner Relief Road, outside of the ‘SLO 2’ lands, is shown on figure 4 below for the benefit of Wicklow County Council.

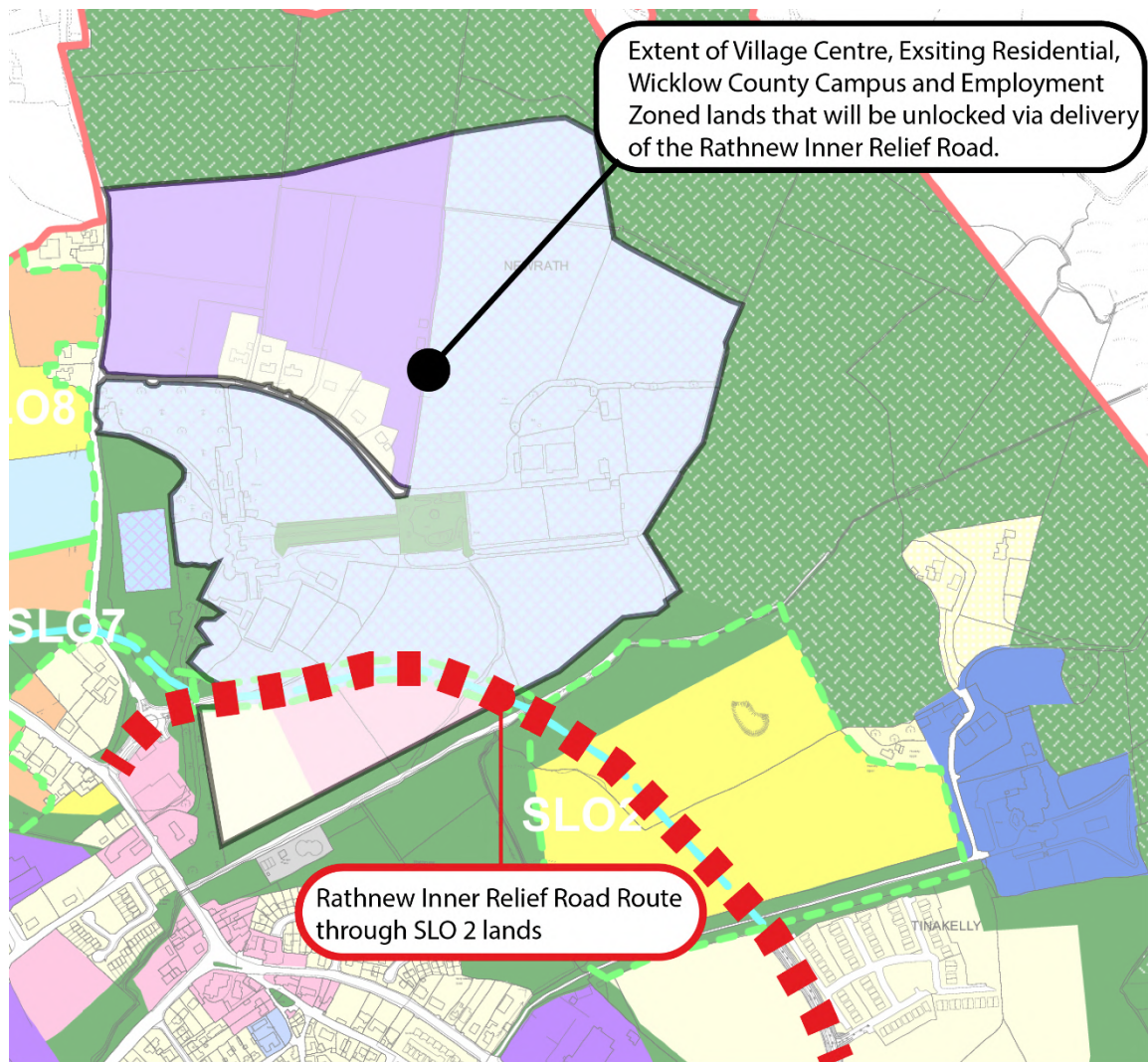


Figure 4 – Area of zoned lands outside of ‘SLO 2’ lands that will be unlocked for development once the Rathnew Inner Relief Road is delivered.

Delivery Mechanism

Our client is also concerned that Wicklow County Council appear to have removed themselves as a funding source for the road within ‘Appendix 3 – Infrastructure Delivery Schedule and Implementation’. We assume that this is a mistake.

It is submitted that the text included within the SLO2 objective relating to the delivery of the Rathnew Inner Relief Road notes only that the road:

‘shall be constructed in full by the developer from Clermont Grove to Tinakilly Park’.



For the avoidance of doubt our client suggests that wording be included to ensure it is fully understood that this road must be jointly funded by the developer, WCC and the State as envisaged under Appendix 3 of the draft plan.

Our submission in relation to this specific item is outlined in Section 2.3 of this submission document.

Phasing:

The objective relating to the delivery of the Rathnew Inner Relief Road also notes that:

‘The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road’.

While we understand that the full delivery of the remaining section of the Relief Road is preferable, the scale of the construction both from a time and funding prospective are significant. It is submitted that it is possible that this objective will delay the delivery of the RIRR..

To offset the cost of the delivery of this significant piece of infrastructure, its delivery should be on a phased basis, allowing for occupation of some houses in tandem with the delivery of the Rathnew Inner Relief Road.

It is noted to Wicklow County Council that as part of the permission on the site granted by Wicklow County Council (WCC Reg Ref. 23/60219), subsequently overturned by An Bord Pleanála (ABP Ref. 319137) that a phased delivery of the Rathnew Inner Relief Road was agreed with Wicklow County Council, based on the following text as included within the agreed Area Action Plan for the lands, which was submitted by our client to Wicklow County Council and approved on 20th September 2021:

‘Delivery of the Rathnew Inner Relief Road may be on a phased basis, but no more than 40 percent of the residential development in the area will be permitted in advance of the full completion of the road’.

It is now submitted by Ardale Property Group to Wicklow County Council that the delivery of the Rathnew Inner Relief Road should be on a phased basis, allowing for the delivery and occupation of 40% of the total residential development quantum on the zoned lands at Clermont – Tinakilly before the road is completed and operational. Any proposed development on the subject lands should be accompanied by a detailed phasing drawing and rationale to be agreed with Wicklow County Council.

SLO 2 Objective:

Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities.

Ardale Property Group Comment:

It is submitted that a creche facility has recently been completed at Broomhall Business Park, Merrymeeting, Co. Wicklow (WCC Reg Ref. 22/590). This creche facility is a purpose built – dedicated facility designed to cater for all childcare requirements arising from Ardale’s developments in the Wicklow Town area.

It is noted that this creche facility is only noted as being ‘under construction’ within the Social Infrastructure Audit published as Appendix 2 of the Draft Wicklow Town – Rathnew Local Area Plan 2025, and the creche places provided by this facility have not been accounted for within ‘Table 2.11 –



Childcare Facilities within the Settlement’ included within the Social Infrastructure Audit. This should be updated to note the childcare facility at Broomhill is operational, and account for the childcare spaces provided by this development as part of the final Wicklow Town – Rathnew Local Area Plan 2025.

A photograph of the operational facility is provided as figure 5 below for the benefit of Wicklow County Council:



Figure 5 – Operational Creche Facility at Broomhill.

As part of application WCC Reg Ref. 23/60219 on the subject lands, it was agreed with the Wicklow County Childcare Committee that this creche facility could cater for the childcare requirements arising from the provision of 352 no. units on the subject lands. This was accepted by Wicklow County Council who granted permission for development on the lands. Subsequently, this grant of permission was overturned by An Bord Pleanala (ABP. 319137) on unrelated matters.

It is therefore submitted that any future application on the subject lands, up to the quantum of 352 no. units as previously agreed with Wicklow County Childcare Committee, should have any requirement for a childcare facility catered for by the creche facility provided off site by Ardale Property Group at Broomhall Business Park, Merrymeeting, Co. Wicklow (WCC Reg Ref. 22/590).

We would propose that a confirmation that no further Creche obligation is required is included as a provision for SLO2 as this is the factual position .

SLO 2 Objective:

Retention of the ‘fairy tree’ at its current location (shown with green tree symbol on map SLO 2)



Ardale Property Group Comment:

Ardale Property Group note the inclusion of an objective relating to the subject lands to retain a tree within the subject lands referred to as a ‘fairy tree’.

It is submitted that this tree was subject to removal as part of the grant of permission issued by Wicklow County Council for application WCC Reg Ref. 23/60219, which was subsequently overturned by An Bord Pleanála (ABP Ref. 319137). The removal of this tree was assessed at Further Information Stage of this proposal, following a request from Wicklow County Council to:

‘submit an updated arborist report in relation to the tree, including any relevant historical information and if appropriate put forward mitigation measures to protect/preserve the tree’.

An assessment of this tree was conducted by The Tree File Arborists, who concluded the following:

‘The ‘Fairy Tree’ is an individual Hawthorn on the southern field as included within the application lands. The Tree File note that this planted area within the southern field on the application site is likely to be naturally arising and is associated with poor, rocky ground conditions. There is no historic or archaeological evidence to suggest that this area of planting on the proposed development site existed prior to the 20th century. It is appreciated that the context of the Hawthorn lends itself to being named as a ‘fairy tree’, through it is considered that this comparison is more associated with parallels of expected appearance rather than any historic connections.

The tree comprises a small community of specimens, dominated by Hawthorn. The cumulative plant stands nearly 8 metres tall, and it is unclear whether it comprises a single plant or combines either 2 or 3 directly adjoining plants whose stems, through continued growth, have combined into a single stem.

The Hawthorn is directly adjoined by additional bramble material including to the southeast by an Elderberry and also elements of Dog Rose and Bramble. Notwithstanding the congested form and combination of plants at the Hawthorn location, its general health status remains reasonably good’.

An Assessment of the history of the tree was also carried out by IAC Archaeology as part of the Further Information Response associated with WCC Reg Ref. 23/60219, who concluded that:

‘As author of the Cultural Heritage Chapter of the EIAR submitted as part of the planning application, I can confirm, that whilst the tree may have local cultural heritage significance to the current population of Rathnew, I can find no record of historic references to this tree during the course of research. One of the key resources for understanding local folklore, is the Schools Collection, published on duchar.ie. The 1930s record for Rathnew School has been reviewed and the ‘Fairy Tree’ at Tinakilly is not included in any of the accounts.

The tree itself is not marked as a Fairy Tree within any of the historic mapping of the proposed development area. The lands in question formed part of the demesne associated with Tinakilly House, which would not have historically been accessible to members of the public. In addition, no footpaths are marked within the historic mapping that would have provided access to the location of the tree. The tree, which is Hawthorn, would not be a tree commonly planted as part of a demesne landscape. Specimen species such as Oak, Beech and Chestnut were commonly used, such as those mature examples along the avenue at Tinakilly, with examples also located along the field boundaries. It is highly likely that the Hawthorn tree post-dates the establishment of the demesne landscape as a whole, with any cultural heritage associations with fairies being established more recently, due to the specimen type.

Hawthorn trees are mentioned multiple times within the above Schools Collection of Irish Folklore, as being associated with buried pots of gold, or associated with the death of someone who cut a Hawthorn down. Bringing the flowers of the tree into the home was considered to be very bad luck. The tree is also associated with spring and are often called ‘May Trees’ and these trees or bushes were



often decorated by children on 1st May (a practice mentioned in the Schools Collection from Rathnew School, although the ‘May Bush’ is noted as being cut and put into the ground).

In summary, it appears that the notion of the ‘Fairy Tree’ at Tinakilly, seems to be relatively recent in terms of origin, with no record of antiquity associated with the site’.

In conclusion, there is no evidence, historic or archaeological, to corroborate or confirm anything other than very recent references to the Hawthorn on the site being a ‘fairy tree’.

Wicklow County Council accepted the submitted rationale for the removal of this tree included within WCC Reg Ref. 23/60219. It is therefore submitted that the proposed tree should not warrant protection on the basis of its species, condition and lack of cultural heritage connection. Our client submits that this objective in relation to the retention of the ‘fairy tree’ on site should be removed on this basis.

SLO 2 – Tinakilly – Newrath Concept Plan

Ardale Property Group also wish to comment on the Tinakilly – Newrath Concept Plan as included within the Draft Wicklow – Rathnew Local Area Plan 2025. In the first instance, we wish to support the inclusion of a concept plan for the subject lands within the Local Area Plan, to guide the proper planning and sustainable development of the area.

It is noted that the SLO2 Concept Plan for the lands almost exactly mirrors the layout included with the application previously made on the subject lands under WCC Reg Ref. 23/60219, which was granted permission by Wicklow County Council on the 2nd February 2024 and subsequently overturned by An Bord Pleanála (ABP Ref. 319137-24), for reasons relating to Plan currency.

A side by side layout of the SLO2 Concept Plan and the WCC Reg Ref. 23/60219 site layouts on the subject lands is shown below for the benefit of Wicklow County Council:



Figure 6 – Site Layout Comparison

It is submitted that any future residential development on the site will need to have regard to site constraints, primarily relating to topography, and may require a deviation from the SLO2 Concept Plan to ensure that development on the site can be implemented. For this reason, Ardale Property Group wish to support the naming of this layout in the Draft Wicklow Town – Rathnew Local Area Plan 2025 as a ‘Concept Plan’.

It is also noted that the SLO2 Concept Plan drawing does not provide for any residential development surrounding the ‘fairy tree’ location on the south eastern portion of the lands.



For the reasons outlined in response to the SLO2 Objective relating to the retention of the ‘fairy tree’, it is submitted that this tree is of no notable ecological or cultural significance, and the objective relating to its protection should be removed from the SLO2 Concept Plan drawing, allowing for residential development to take place in this area of the subject site.

2.3 Draft Wicklow Town – Rathnew Local Area Plan 2025 - Appendix 3 - Infrastructure Delivery Schedule and Implementation

Our client also wishes to make a submission in relation to Appendix 3 - Infrastructure Delivery Schedule and Implementation as included with the Draft Wicklow Town – Rathnew Local Area Plan 2025.

This submission item relates to Section 5 – Infrastructure Delivery Schedule, which includes a ‘Implementation & Infrastructure Delivery Schedule Table. Within this table, the delivery schedule and funding is outlined for Infrastructure projects within Wicklow-Rathnew. The Rathnew Inner Relief Road is included within the ‘Transport’ section of this table as follows:

Infrastructure	Delivery Schedule	Funding
TRANSPORT		
Implement measures identified in ‘Wicklow Town –Rathnew Transport Assessment’	On-going	Developer, State, WCC
Park and ride facilities	Short term	Developer, State, WCC
Improvement to bus links to Wicklow train station	Immediate term – Short term	State
DART extension to Wicklow train station	Short term – Medium term	State
Improvements to mainline train and DART services	Medium term	State
Improve the capacity of the Rocky Road from Junction 17 to the Town Centre	Short term – Medium term	State, WCC
Improved and new bus services within and ‘in and out’ of the Settlement	Short term – Medium term	State
Complete the Rathnew Inner Relief Road	Short term – Medium term	Developer, State
Connect the Dublin Road to the Glenealy Road (via Milltown)	Medium term - Long term	Developer, State, WCC
General Road Improvements	On-going	Developer, State, WCC
General Footpath Improvements	On-going	Developer, State, WCC
General Cycle Improvements	On-going	Developer, State, WCC
General Car parking Improvements	On-going	Developer, State, WCC

Figure 7 – Wicklow – Rathnew Town Local Area Plan 2025 – Implementation & Infrastructure Delivery Schedule Table.

It is submitted by Ardale Property Group that the ‘funding’ section of this table lists that the Rathnew Inner Relief Road will be funded entirely by the Developer and the State. This would be a significant change in approach with negative implications for the delivery of the RIRR. We request that Wicklow County Council are added as a funding party to this table.

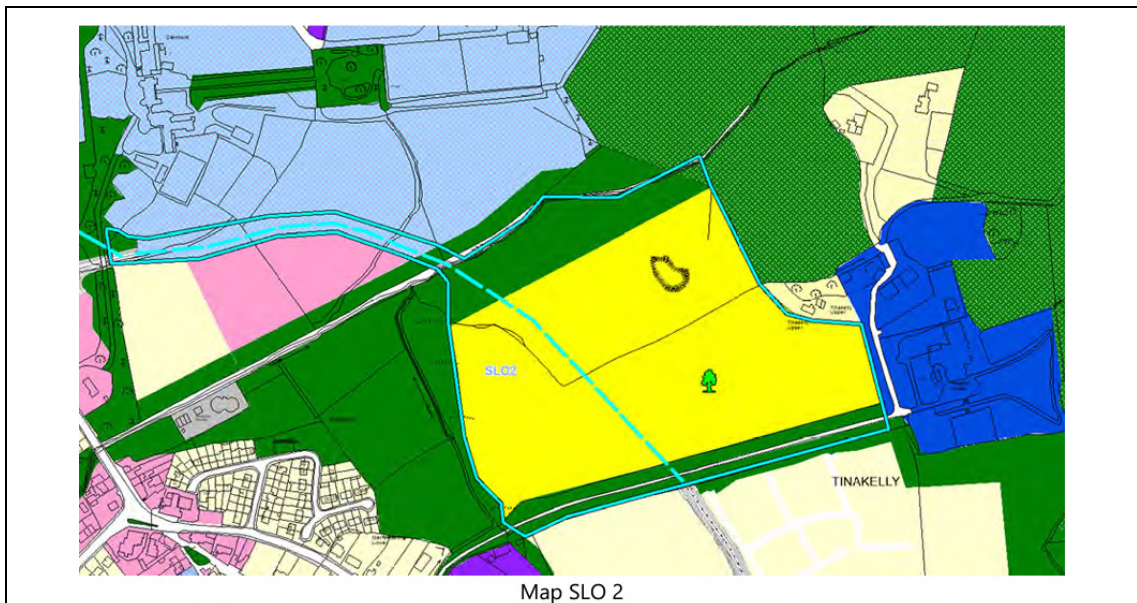


3 Ardale Property Group – Requested Amendments to SLO 2 – Tinakilly/ Newrath Objectives

Following the comments provided in Section 2.2 and 2.3 above relating to SLO 2 Tinakilly/ Newrath Objectives, the SLO2 Concept Plan and Appendix 3 - Infrastructure Delivery Schedule and Implementation as included within the Draft Wicklow Town – Rathnew Local Area Plan 2025, our client, Ardale Property Group, now wish to suggest the below amendments to these Objectives, Concept Plan, and Appendix documents for inclusion within the Final Wicklow Town – Rathnew Local Area Plan 2025.

3.1 Requested Amendments – SLO2 Tinakilly/ Newrath Objectives

Where it is submitted that text be removed, this is shown in red with a strikethrough. Inclusion of new suggested text is shown in green:



Map SLO 2

This SLO is located in the townlands of Tinakilly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, and this Local Area Plan and the following:

- Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to reduce congestion in Rathnew village centre, and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the developer from Clermont Grove to Tinakilly Park and funded in accordance with 'Appendix 3 – Infrastructure Delivery Schedule and Implementation' ~~in full by the developer~~. The delivery of the RIRR may be on a phased basis, ~~but no dwelling within the SLO may be occupied until the full completion and operation of the road~~. ~~allowing for the delivery and occupation of 40% of the total residential development quantum on the zoned lands at Clermont – Tinakilly before the road is completed and operational.~~ Any proposed development on the subject lands should be accompanied by a detailed phasing drawing and rationale to be agreed with Wicklow County Council.
- ~~— Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and~~ Due to the upfront delivery of the Broomhall Creche covering the entire Tinakilly development, no further creche obligations exist within SLO 2.



~~Retention of the ‘fairy tree’ at its current location (shown with green tree symbol on map SLO 2)~~

3.2 Requested Amendments – SLO2 Tinakilly/ Newrath Concept Plan

In addition to the suggested amendments outlined above in relation to the SLO2 Tinakilly/ Newrath Objectives included in the Draft Wicklow – Rathnew Local Area Plan 2025, Ardale Property Group also wish to suggest the following in relation to the SLO2 Concept Plan layout included within the Local Area Plan Draft:

- Removal of the marker on the Concept Plan denoting the location of the ‘fairy tree’, and the amendment of the Concept Plan Layout to shown residential development in the area of the site currently denoted as the location of the ‘fairy tree’.

3.3 Requested Amendments – Appendix 3 Infrastructure Delivery Schedule and Implementation

It is also requested by Ardale Property Group that Section 5 of Appendix 3 - Infrastructure Delivery Schedule and Implementation as included with the Draft Wicklow Town – Rathnew Local Area Plan 2025, specifically the ‘Transport’ section of the- ‘Implementation & Infrastructure Delivery Schedule Table’ is amended to include Wicklow County Council as a funding party for the Rathnew Inner Relief Road, in line with the Framework Agreement between Wicklow County Council and the Developer, as follows, with proposed additional text shown in green:

Infrastructure	Delivery Schedule	Funding
TRANSPORT		
Implement measures identified in ‘Wicklow Town –Rathnew Transport Assessment’	On-going	Developer, State, WCC
Park and ride facilities	Short term	Developer, State, WCC
Improvement to bus links to Wicklow train station	Immediate term – Short term	State
DART extension to Wicklow train station	Short term – Medium term	State
Improvements to mainline train and DART services	Medium term	State
Improve the capacity of the Rocky Road from Junction 17 to the Town Centre	Short term – Medium term	State, WCC
Improved and new bus services within and ‘in and out’ of the Settlement	Short term – Medium term	State
Complete the Rathnew Inner Relief Road	Short term – Medium term	Developer, State, WCC
Connect the Dublin Road to the Glenealy Road (via Milltown)	Medium term - Long term	Developer, State, WCC
General Road Improvements	On-going	Developer, State, WCC
General Footpath Improvements	On-going	Developer, State, WCC
General Cycle Improvements	On-going	Developer, State, WCC
General Car parking Improvements	On-going	Developer, State, WCC

Figure 8– Requested Amendment - Wicklow – Rathnew Town Local Area Plan 2025 – Implementation & Infrastructure Delivery Schedule Table.





4 Conclusion

Our Client, Ardale Property Group, welcome the publication of the Draft Wicklow Town – Rathnew Local Area Plan 2025, and the opportunity to comment on the future development of Wicklow.

Our client emphasises their availability to meet Wicklow County Council to discuss any issues arising in the foregoing relating to their subject lands.

We trust that the matters outlined above will be taken into consideration as part of the preparation of the final Wicklow Town – Rathnew Local Area Plan 2025.

We confirm we act for **Ardale Property Group** and request that all future correspondence in relation to this matter be directed to this office.

