



Blessington Local Area Plan Submission - Report

Who are you:	Agent
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Email Address:	[REDACTED]
Reference:	BLESSLAP-172703
Submission Made	April 3, 2024 5:31 PM

Topic

Compact Growth - Housing - Population Growth

Submission

Please refer to the enclosed submission. Many thanks.

File

Q65724 Pre-Draft Submission Blessington LAP _2024_ v2.0.pdf, 1.03MB

[REDACTED]

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

Wednesday, 3rd April 2024

To whom it may concern,

RE: SUBMISSION MADE IN RELATION TO THE SUSTAINABLE AND SEQUENTIAL ZONING AND DEVELOPMENT OF LANDS AS PART OF THE PRE-DRAFT STAGE OF THE BLESSINGTON LOCAL AREA PLAN

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹ have been retained by Marshall Yards Development Company Limited² to prepare this submission in relation to the Pre-Draft Stage of the Blessington Local Area Plan (LAP).

The purpose of this submission is to advocate for the protection and consolidation of zoned lands in sustainable and sequentially appropriate locations. Most notably, this includes sites that are: centrally located, infill in nature (i.e. surrounded by development on multiple sides) and within reasonable distances from key services, facilities and amenities via active and public modes of transport.

Specifically, in applying the principles of compact growth and sequential development, this submission seeks the retention of zoning on appropriately located sites, such as our Client's in the centre of Blessington – see Figures 4.1 and 4.2 below.

At the outset, our Client welcomes this first stage of the preparation and adoption of the Blessington LAP. They look forward to engaging its drafting and its intention to deliver planned development.

2.0 INFILL DEVELOPMENT AND COMPACT GROWTH

In recent years, planning and development policy at national, regional and local levels has shifted focus to the sustainable use of land within existing settlements and their built-up envelopes. This involves infill development on undeveloped/greenfield sites, reuse of vacant/derelict properties, redevelopment of brownfield sites and increases in densities and

¹ [REDACTED]

² [REDACTED]

building heights. This 'compact growth' approach to planning and development recognises the benefit in prioritising existing developed areas, resulting in the (1) protection of land resources, (2) use of existing infrastructure and (3) creation of critical mass needed to sustain existing and promote new businesses and local services.

At national level, compact growth has come to feature as a key tenet in the *National Planning Framework*. It is listed as National Strategic Outcome (NSO) No. 1 (of 10), with the NPF remarking:

*"Carefully managing the **sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work**. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. **Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.**"*
[emphasis added]

The overall target of the NPF is "...for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites."

NSO No. 1 translates to a series of National Policy Objectives (NPOs), which seek to define more specific targets for housing and general development within existing settlements. Of note are the following:

NPO 2a – "A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs."

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

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

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

NPO 11 – "In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."

The NPF's NSOs and NPOs have since filtered down to the regional level, with compact growth heavily emphasised as a priority in the *Regional Spatial and Economic Strategy for the Eastern and Midland Region* (RSES). It features as the RSES's Regional Strategic Outcome (RSO) No. 2, 'Compact Growth & Urban Regeneration':

*"Promote the regeneration of our cities, towns and villages by **making better use of under-used land and buildings within the existing built-up urban footprint** and to drive the delivery of quality housing and employment choice for the Region's citizens."*
[emphasis added]

The RSES also includes Regional Policy Objective (RPO) 3.2 as a target:

"Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas."

In accordance with the 'hierarchy of plans', the foregoing carries through to the local level in County/City Development Plans and Local Area Plans. For County Wicklow specifically, we are cognisant of the content in the *Wicklow County Development Plan 2022–2028* (Development Plan).

For example, the Development Plan includes Strategic County Outcome 1 (SCO1): 'Sustainable Patterns & Compact Growth'. SCO1 states:

"The delivery of compact growth in all towns and villages by capitalising on the potential for infill and brownfield development, moving away from a reliance on greenfield development and creating places that encourage active lifestyles is essential for the successful delivery of the development plan strategy." [emphasis added]

Additionally, Settlement Strategy Objectives seek the infill development and compact growth of the County's settlements. Amongst these are the following:

CPO 4.2 – *"To secure compact growth through the delivery of at least 30% of all new homes within the built-up footprint of existing settlements by prioritising development on infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites." [emphasis added]*

CPO 4.3 – *"Increase the density in existing settlements through a range of measures including bringing vacant properties back into use, reusing existing buildings, infill development schemes, brownfield regeneration, increased building height where appropriate, encouraging living over the shop and securing higher densities for new development." [emphasis added]*

2.1 Core Strategy Application in Infill Locations

Additionally, we note the Council's distinct prioritisation of the development of infill sites within existing settlements as facilitated by its Core Strategy. In relation to the zoning of land, under 'Principle 1: Compact Growth', the Development Plan states:

"In cognisance that the potential of town centre regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this Core Strategy and associated tables on the number of units that may be delivered on town centre regeneration / infill / brownfield sites." [emphasis original]

Evidently, there is a clear and robust policy-basis to support the zoning and development of centrally located lands within existing built-up areas. However, on the last point above, we are of the opinion that there is room for the Council to translate the above flexibility to a local level. We note that in Variation No. 1 to the *Meath County Development Plan* (currently out for consultation), Meath County Council recognised this opportunity, proposing the following text:

"While the Core Strategy relates to the concept of a hierarchy of settlements and related residential provision based on the principle that towns must grow at a

sustainable and appropriate level, the growth rate must therefore be linked to all other social and physical provisions within a settlement such as school provision, transport provision, social services, retail provision, recreational and green spaces.

Where settlement household allocations are therefore reaching or at capacity and where centrally located brownfield/infill sites remain available for development, prioritization will be given to vacant sites in town centre locations once physical and social infrastructure is available and adequate. Such development in brownfield or town centre locations should be considered Core Strategy neutral and therefore acceptable subject to all other normal planning considerations.” [emphasis added]

Given the settlement of Blessington is nearing its “housing target” as set by the County Development Plan’s Core Strategy, there is a pragmatic and sustainable basis upon which to provide appropriate and site-specific flexibility. It is a town with available land, multiple appropriately located sites, ample services and social infrastructure, an appeal for existing and prospective residents. Due to its scale and potential, it is an ideal town at which to accommodate additional housing, thereby delivering critical mass and a more sustainable concentration of development.

3.0 SEQUENTIAL DEVELOPMENT

However, whilst development within existing settlements is heavily emphasised, it is nuanced by a ‘sequential’ approach to same. This approach generally prioritises centrally located and/or better served sites over more peripherally located sites – i.e. it seeks an ‘in-to-out’ approach to development.

Development Plans: Guidelines for Planning Authorities (2022) provides guidance in relation to the sequential approach. Its Section 6.2.3 articulates how it should be applied and requires Local Authorities to adopt its principles:

“It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.”

Aligning with this, ‘Principle 4: Sequential Approach’ features in the Development Plan. It is also contained as Objective CPO 6.19: *“The development of zoned land should generally be phased in accordance with the sequential approach as set out in this chapter. The Council reserves the right to refuse permission for any development that is not consistent with these principles.”*

Therefore, the Council is obliged to, and clearly does, advocate for a sequential approach to development. We kindly request that the Council continues to do so in the drafting of the Blessington LAP.

4.0 APPROPRIATENESS OF ZONING KEY LANDS IN BLESSINGTON

Having considered the above fundamental principles of compact growth and sequential development, we contend that our Client’s landholding within the centre of Blessington is ideally located. As shown in Figures 4.1 and 4.2 below, it is:

- **Compact Growth** – Within the planning settlement boundary, within the existing built-up area as an infill fill site; and
- **Sequential Development** – Within/proximate to the centre of Blessington and served by a host of important services, facilities and amenities (including childcare, primary and post-primary schools, community facilities, convenience retail, personal services, etc.).

We also note for the Council's awareness that the site is fully-serviced with respect to water infrastructure, roads, footpaths, cycle tracks, public lighting, etc., thereby defining it as a 'Tier 1' serviced site, in our opinion.

Positively, the site already benefits from extant planning permissions (Reg. Refs. 20184 and 20362) and our Client intends to deliver development thereat in the near-term for the benefit of Blessington. Consequently, there is a logical basis to retain a zoning at a site that will soon be developed.

However, although we firmly contend that there is a strong rationale for retaining the zone at the site, we are of the opinion that there is an opportunity to rationalise the zoning designations thereat. The area of the site zoned 'Town Centre' (per the *Blessington Local Area Plan 2013–2019*) could be rezoned to 'Proposed Residential' to create a uniform and more coherent zoning assignment on-site.

A full justification in support of retaining the zoning of the site will be presented at the Draft stage of the LAP.

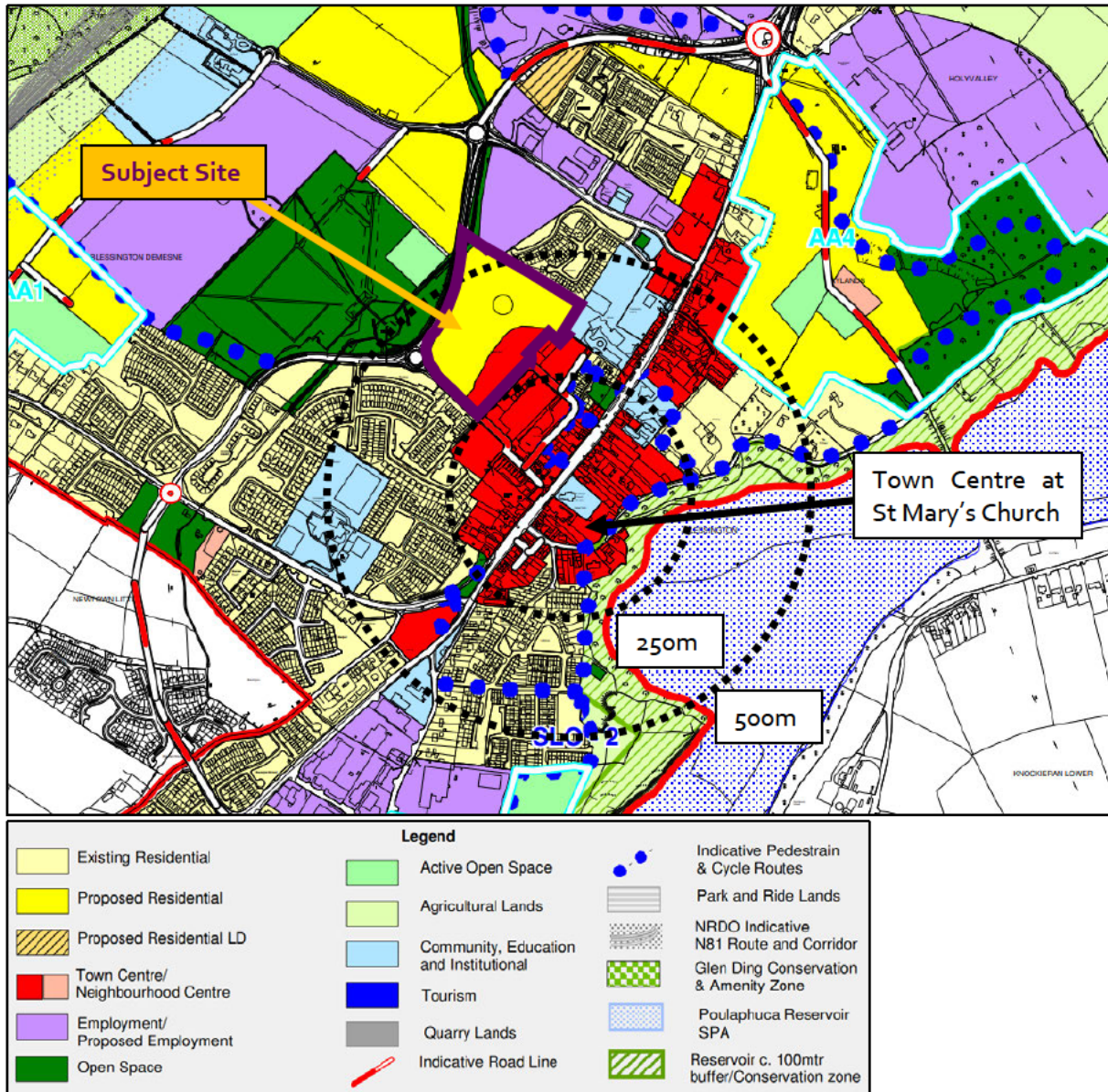


Figure 4.1: Proximity of our Client's site to Blessington town centre, based on the zoning map of the *Blessington Local Area Plan 2013–2019*

Source: *Blessington Local Area Plan 2013–2019*, annotated by Thornton O'Connor Town Planning (2024)

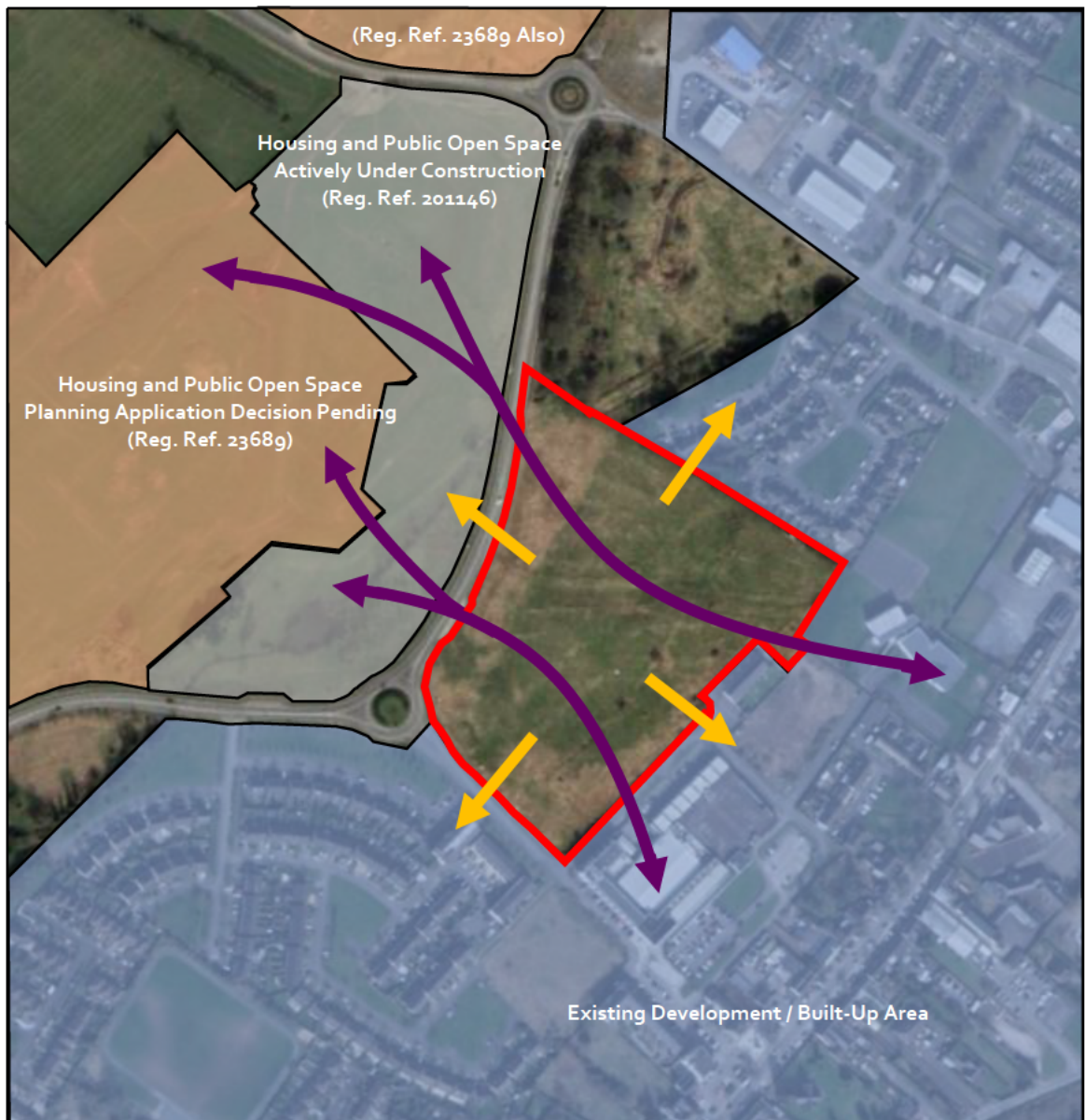


Figure 4.2: Orange arrows demonstrating the site’s enclosure on its 4 No. sides, making it ‘infill’, and purple arrows demonstrating how the site’s development will integrate the existing and under construction area of the town to counter leapfrogging

Source: Google Earth (image March 2022), annotated by Thornton O’Connor Town Planning (2024)

5.0 CONCLUSION

In conclusion, we wish to reiterate our Client’s welcoming of the Pre-Draft Stage of the LAP.

We contend that the application of the key principles of compact growth and sequential development is vital and that sites that comply with same should retain land-use zoning designations. Additionally, we strongly advocate for a pragmatic and flexible application of the County Development Plan’s Core Strategy “housing target” for appropriately serviced and located infill sites in Blessington.

We look forward to engaging in later stages of the Plan's drafting, although please do not hesitate to contact the undersigned should your required additional insights.

Yours faithfully,

A handwritten signature in black ink that reads "Sadhbh O'Connor". The signature is written in a cursive, flowing style.

Sadhbh O'Connor
Director
Thornton O'Connor Town Planning