



Wicklow Town - Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Ardale Property Group
Email Address:	vitalija@brockmcclure.ie
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Topic

Compact Growth - Housing - Population Growth

Submission

Please see submission attached.

Map



Site Description:

File

Lands at Mariners Point LAP Submission.pdf, 0.91MB

Draft Local Area Plan Submission – Issues Paper Stage



On behalf of

Ardale Property Group

September 2023



Planning & Development Consultants

63 York Road,

Dun Laoghaire

Co. Dublin

www.brockmcclure.ie



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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 in response to the notification by Wicklow County Council of its intention to prepare the Draft Wicklow Town – Rathnew Local Area Plan 2024.

We note the relevant submission date is **28th September 2023** in this case and this Submission is lodged within that timeframe.

On 19th July 2023 Wicklow County Council (WCC) commenced a review of the current Wicklow Town – Rathnew Development Plan 2013-2019 and preparation of a new Wicklow Town – Rathnew Local Area Plan (LAP) 2024. Our client welcomes the opportunity to provide a submission on this review and to engage on the future direction of the Town and we trust our input will be considered during the formulation of the new Plan and future development of Wicklow Town – Rathnew.

Whilst we acknowledge that at this stage of the process, it is not possible to consider matters relating to zoning and specific policy objectives, this submission is simply requesting the Council to consider the optimal, sustainable uses of these strategically located lands within our clients ownership in Wicklow Town – Rathnew and to consider the optimal, sustainable uses of their lands and to take this into account in terms of the National Policy mandate relating to the delivery of housing units.

Our client welcomes the opportunity to provide a submission on the Pre-Draft LAP and looks forward to future engagement with the Planning Authority throughout the plan making process.

1.1 Client's Background

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

Ardale is an established Irish development and strategic land investment company. At our core, we are focused on crafting strategic lands 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 shareholders have been at the forefront of land planning and development for over 20 years, having owned and developed some of the most high-profile developments in Ireland. Their ownership interests spanned from one of Irelands largest homebuilders, Castlethorn Construction through to the Country's most valuable investment asset, Dundrum Town Centre, as well as a host of other office, retail and development land assets including: Whitewater Shopping Centre, Newbridge; The Park, Carrickmines; and residential schemes in Dublin such as Adamstown, Rathborne and Belarmine.

Ardale are hugely active in County Wicklow, with housing schemes such as Heatherside in Arklow (200 units) and Tinakilly Park in Rathnew (365 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

This submission in respect of the Pre-Draft Issues Paper for the Wicklow Town – Rathnew LAP is made in so far as it relates to our client's land parcel at **Mariner's Point**.

1.2.1 Mariner's Point, Wicklow Town

Our client controls c. 7.52 ha located to the south of Wicklow Town adjoining Mariner's Point development on Greenhill Road and comprise of partially brownfield lands of approx. 4.22 ha.

The northern portion of the site comprises of unfinished development with foundations poured in a number of dwellings from a previous expired permission. The north and northeastern portion of the site is bound by existing mature residential developments. The remainder of the site is bound by undeveloped, greenfield lands. The site sits approx. 4km from the M11 Motorway providing easy access to the M50 and the wider road networks.

As part of development Phase 1, the northern portion of the site now has the benefit of planning permission for 74 no. residential units (Reg. Ref. 22/504 refers) for which construction is soon to commence in October. Lands to the south will form the second phase of development which will be subject to a future planning application to Wicklow County Council. The indicative site layout relating to the second phase of development was included with the planning application documentation of Reg. Ref. 22/504.



Figure 1 – Aerial View with site outlined in Red

The general site context is summarised as follows:

- The subject site forms part of a residential development permitted under Ref. 04/753, and revised and extended under Refs. 06/5921, 07/835, 09/380, 15/34 (EOD), 17/1542 and 22/504.
- The site is now considered an vacant and underutilised brownfield site, connected to the partially developed Mariner's Point residential development.
- The site is connected to Wicklow Town Centre by existing footpaths and roads (Ballyguilemore Road). The site has the benefit of access to a variety of existing amenities, educational and commercial facilities and services nearby.
- The site is not located on or near any protected structures, Architectural Conservation Areas or special areas of natural heritage.





This site serviced / serviceable via new connection to existing systems including water and wastewater infrastructure and permitted road infrastructures in place. The zoning which includes residential development provides an opportunity to consolidate existing development at this land parcels.

Having regard to the above, it is considered that the site can provide much needed residential accommodation proximate to the town/village centres.

It is our professional opinion that the subject sites' location in terms of accessibility to Wicklow Town Centre, proximity to existing transport nodes and local and employment areas makes it an ideal candidate to assist with the delivery of additional residential accommodation in accordance with the National Planning Policy Mandate, discussed further in Section 3 of this submission.



2 Wicklow Town – Rathnew Development Plan 2013-2019

2.1 Zoning

Mariner’s Point

Under the current Wicklow Town-Rathnew Development Plan 2013-2019, the subject site has two residential land-use zonings. The northern portion of the site is zoned ‘RE – Residential – Infill:’ with an objective to ‘protect and preserve existing residential uses and provide for infill residential development’ while the southern portion of the site is zoned ‘R4 – Residential’ with an objective to ‘to provide for new residential development at densities up to 10 units per hectare.’

Both site zonings above permit the following uses in principle:

“new dwellings, education, home based commercial activities, religious building, creche or nursery school, community facility, open space, playground, residential institution, skate park.”

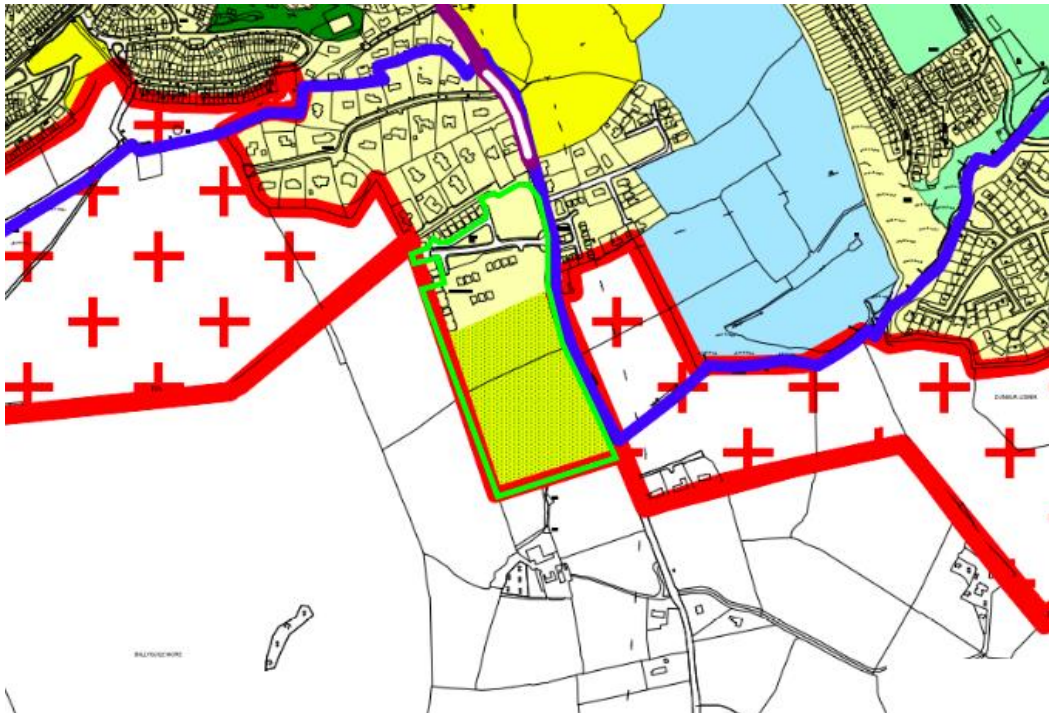


Figure 2 – Wicklow Town – Rathnew Development Plan 2013-2019 Zoning (site outlined in Green).

The existing zoning is considered compliant with the zoning principles outlined in the Wicklow County Development Plan 2022-2028 that promote compact growth, deliver population and housing targets, promote higher densities and follow the sequential approach.

We ask that no changes are made to the existing zoning pertaining to the site, having regard to the previous or extant permissions for residential development on both sites.



3 National Policy Mandate

National Planning Framework (NPF)

The National Planning Framework (NPF) is the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of new development on infill and brownfield sites for housing and particularly those close to public transport corridors is key to enabling growth such as the site at Mariner’s Point.

Section 2.6 of the NPF states the following in relating to compact and sustainable growth:

*“A preferred approach would be **compact development that focuses on reusing previously developed, ‘brownfield’ land, building up infill sites**, which may not have been built on before and either reusing or redeveloping existing sites and buildings.*

An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference.”

The document goes onto state the following in relation to infill and brownfield development:

*“The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. **This is applicable to all scales of settlement, from the largest city, to the smallest village.**”*

National Policy Objective 72a – *“Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.”*

National Policy Objective 72b – *“When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.”*

Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)

The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* contains a specific objective (RPO 4.3) which sets out the following in relation to **Consolidating and Re-Intensification**:

*“RPO 4.3: Support **the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs** and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

Having reviewed the key policies of the recently adopted RSES document, we are of the view that subject site at Mariner’s Point constitutes a brownfield site and that residential use could be achieved on the site in accordance with the spirit and intent of RSES in order to ensure the optimal sustainable long terms use of the site which is:

- An *Underutilised infill site* within the metropolitan area of Dublin in close proximity to high frequency public transport services.

Population Projections

Specific regional and county population projections to 2026 and 2031 are provided for each region in the “Implementation Roadmap for the National Planning Framework”, which sets a growth trajectory for each area to be applied in the core strategies of all subsequent Development Plans and associated variations.





The overarching objective is to manage an adequate supply of land to 2026 and beyond that to 2031. The Regional Spatial and Economic Strategy for the Eastern and Midland Region specifically states the following:

“... the zoning of land and planning permission alone, do not necessarily guarantee delivery and population growth in accordance with projected, targeted timeframes. Therefore, in planning for future growth, it will be important for planning authorities to set out and monitor the service capacity and likely rate of completion of development on zoned lands, both brownfield and greenfield as well as elsewhere, having regard to local conditions and trends.”

In this respect, we note that population projections and associated zoned land supply are often considered to be maximum numbers to be allowed through the planning system rather than being a minimum effective supply to maintain sustainable levels of growth. Should housing allocation figures be taken as a maximum by Local Authorities, housing supply could be severely constrained, as longstanding market barriers and on-site constraints are often not adequately considered in the conversion rates of permitted housing to completed and occupied units.

In a review of the annual returns by the Dublin Housing Task Force (Department of Housing, Planning and Local Government) over the last 4 years, recent trends suggest that the average estimated conversion rate for residential units permitted, is in the region of 25%. Therefore, in order to deliver the number of completed and occupied units required in a given area, approximately three times as many units will need to be permitted to ensure adequate delivery of housing supply. By extension, this has obvious connections with the provision of zoned land to ensure adequate availability of residential sites.

We respectfully request the Planning Authority to have regard to the above in the next stage of the Local Area Plan process by ensuring that the accuracy as well as the basis of the population projections are fully considered, accurately presented using the latest Census 2022 figures; and set out in the Plan and that the zoning of well placed, infill/brownfield lands in close proximity to public transport services is identified in the next stage of the plan making process.

3.1 Key Summary of the National Policy Mandate

The National Planning Framework signals a shift in Government policy towards **securing more compact and sustainable urban development, which requires at least half of new homes within Ireland’s cities to be provided within the existing urban envelope.**

National policy further supports and reinforces **the need for urban infill residential development in close proximity to quality transport routes and within existing urban areas.**

The Mariner’s Point site is considered underutilized and constitutes a brownfield site in planning terms. The site is located on a well-established residential zoned site within the settlement boundary surrounded by existing and future residential developments.

More specifically, the delivery of uses such as residential on this prime, infill/brownfield, underutilised site, in our considered view would be consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.

We respectfully request that Wicklow County Council consider this as before the publication of the Draft Wicklow Town-Rathnew LAP.





4 Wicklow County Development Plan 2022-2028

Under the Wicklow County Development Plan 2022-2028, there have been no zoning changes made to lands within Wicklow Town – Rathnew Area.

Wicklow is recognised as the County town, providing important administrative and local government functions. The town is strategically located on the M/N11 and south-eastern rail corridor, at the centre point of the coastal area of the County. It is an economically active town that provides higher order services and facilities for the residents of the town and its catchment. Within the settlement, Rathnew has a distinct identity and functions as a local service centre for its local community.

Wicklow Town-Rathnew is considered a Level 2 Key Town in the Core Region with 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.

Core Strategy

It is estimated that Wicklow-Rathnew region will yield 52% of the total projected population increase in the County to 2031.

A minimum of 30% of the targeted housing growth shall be directed into the built up area of the settlement. In order to ensure however that overall housing and population targets are not exceeded to any significant degree, the amount of land zoned for the housing development outside of the built up envelope of any existing settlement shall not exceed 70% of the total housing target for that settlement.

As a ‘Core Region Key Town’, the settlement should provide housing for people from across the County and region.

Infrastructure

As illustrated in Figure 3 below, Wicklow-Rathnew is serviced by adequate water, wastewater and road infrastructure. Wicklow-Rathnew is considered a Tier 1 zoned area.

Town / Village	Plan Name	Infrastructure			Zoning Tier
		Waste water	Water	Transport (Roads, lighting footpaths etc)	
Wicklow Rathnew	Wicklow & Rathnew Town Development Plan (to be replaced post CDP adopted with LKAP)	Serviced by the Wicklow Wastewater Treatment Plant currently operating below design capacity (34,000pe, operating at c. 19,000pe) and has capacity to accommodate the growth targeted by the Core Strategy (including Ashford).	Supplied with potable water from the Vartry water supply and is well within operational capacity. Upgrade to increase capacity is due for completion in 2021	Local level supporting infrastructure to be provided in accordance with the implementation of relevant local planning permissions and the Council’s capital investment programme.	Tier 1

Figure 3 – CDP Appendix 9 Infrastructure and Zoning Bands

Phasing

We refer to the following extract from Section 6.3.4 of the County Development Plan with regards to the phasing of development:

“The development of zoned / designated land should generally be phased in accordance with the sequential approach:

- Development should **extend outwards from the primary area with undeveloped land closest to the core and public transport routes** being given preference, i.e. ‘leapfrogging’ to peripheral areas shall be resisted;
- A strong emphasis should be placed on **encouraging infill opportunities and better use of under-utilised lands** and;
- **Areas to be developed should be contiguous to existing developed areas.**



Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.”

The Plan describes the sequential approach as follows:

Principle 4: Sequential approach

The priority locations for new residential development will be:

- Priority 1 In the designated ‘town’ and ‘village’ / ‘neighbourhood centres’ or ‘primary zone’ through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.
- Priority 2 Strategic Sites as identified by the RSES and associated MASP
- Priority 3 Infill within the existing built envelope of the town, as defined by the CSO Town boundary
- Priority 4 Where a need for ‘greenfield’ residential development is identified, the ‘two-tier approach’ to land zoning as set out in the NPF will be taken i.e.

Tier 1 Serviced Zoned Land is described in the Draft Plan as follows:

- *This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.*
- *These lands will generally be positioned within the existing built-up footprint of a settlement or **contiguous to existing developed lands**. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*
- *Inclusion in Tier 1 will generally require the lands to within the footprint of or spatially sequential within the identified settlement.*

We conclude that there are no barriers to residential development at the lands at Mariner’s Point, Wicklow Town. The lands have the benefit of previously permitted and extant permissions and represents partially completed development. Construction is soon to commence in October / November 2023 for 74 no. residential units granted under Reg. Ref. 22/504 as part of Phase 1 of development. The remainder of the site as part of Phase 2 is serviced or serviceable via new connection to existing systems with existing and permitted road infrastructure in place and capable of providing further residential units.



5 Submission

Our client looks forward to a new LAP for Wicklow Town – Rathnew that follows best practice Guidelines, takes full account of current strategic planning policy and generally promotes the sustainable development of the town, so that it can fulfil its ambitious role in the overall County hierarchy.

We have taken the opportunity to respond to themes highlighted in the Council’s Issues Paper, as follows:

5.1 Theme 1: Housing – Population – Compact Growth

As noted by the Issues Paper, Wicklow Town – Rathnew will need c. 1,500 new homes built between now and 2031. To facilitate compact growth, 30% of new homes need to be in the existing built-up area and town / village centres. Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet this housing target. These homes must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment.

The map below, shows the existing LAP settlement boundary in red with the existing residential zoning in cream, town centre zoning in red and the lands that are zoned for new housing in orange.

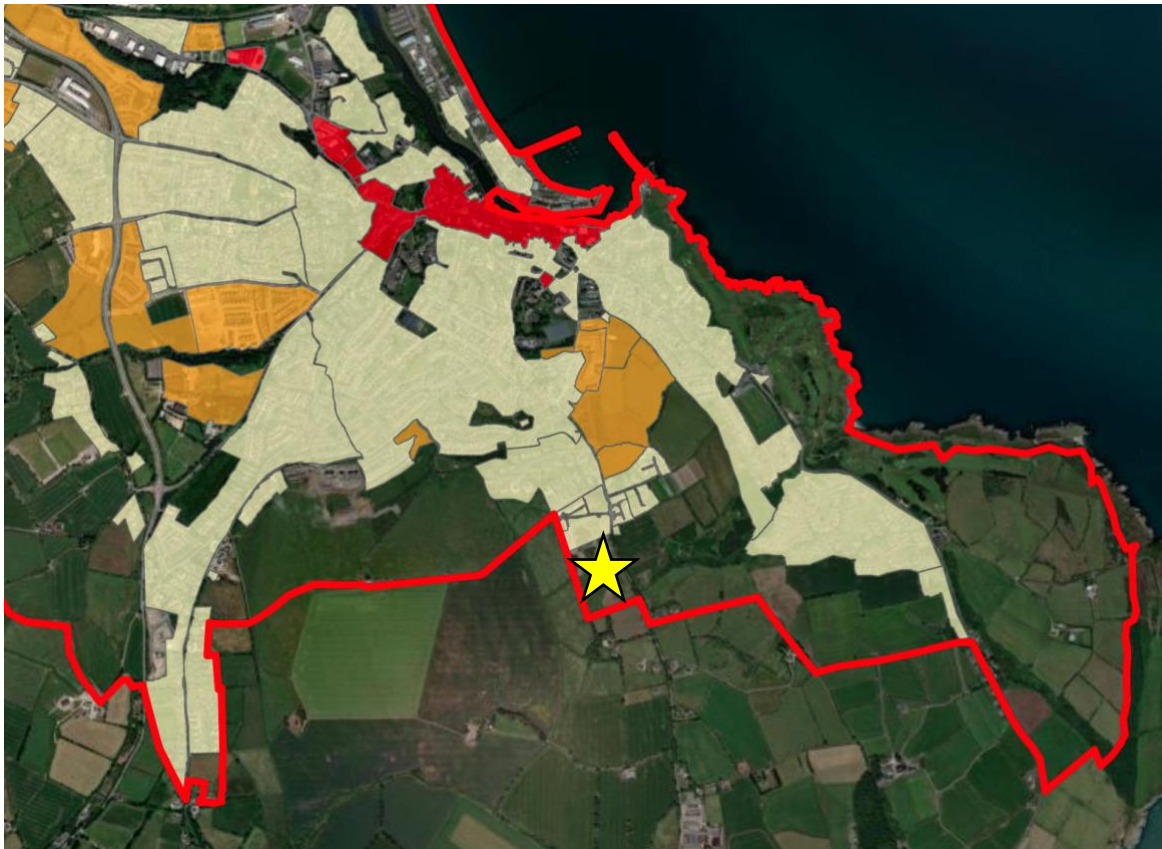


Figure 4 – Existing and New Residential Zonings (Mariner’s Phase 2 lands identified via yellow star)

The Phase 2 lands at Mariner’s Point are excluded from this map as indicated by the Yellow Star above.

Where do we deliver our new housing without contributing to urban sprawl?

RECCOMENDATION:

The subject lands at Mariner’s Point benefit from substantial site services and network of road / footpaths serving the occupied dwellings to the north. The lands are located less than 1 km from nearby

schools and bus services and c. 1.2 km from retail services and facilities in Wicklow Town Centre, connected by a continuous footpath.

We highlight the locational attributes of the subject site which is adjacent to the town boundary and within the development boundary of the existing LAP, coupled with planned infrastructure projects forming a natural extension of the settlement. There is a clear opportunity for efficient and suitably intense housing to be brought forward on this site which will ultimately form part of a much wider existing residential offering in Wicklow Town.

We refer the Planning Authority to the Ballyguilemore Footpath Part 8 Scheme under Reg. Ref. 23643 which proposes to provide new pedestrian facilities and road safety improvements along Ballyguilemore Road between Carrig View and the entrance to the proposed new St. Patricks GAA Pitch. This scheme proposes to include new footpath, public lighting, boundary fencing and hedgerow, and road widening works. This will form a natural extension of the settlement boundary and will bring appropriate new public infrastructure directly adjacent to the subject site.

Further, it is noted that the permission granted by the Planning Authority under Reg. Ref. 22/504 for the construction of 74 no. residential units has been designed so as to incorporate the Phase 2 lands i.e., the design and layout of roads and open spaces since the early design stage of the first phase of development has had the second phase in mind to ensure that all proposed works form part of an integrated development solution for the overall site. An indicative site layout relating to the second phase of development was submitted to the Planning Authority as part of the planning application documentation for Reg. Ref. 22/504 and we refer the Planning Authority to Figure 5 below for further information in this regard. Without the development of the second phase lands, the permitted Phase 1 development will result in a number of cul-de-sacs on site and will not present the desired or optimal planning solution for the lands and its surrounding context.

It is therefore considered that the subject lands can deliver quality residential development on a serviced site in accordance with the 'sequential approach' extending outwards from the town centre core area developing the closest brownfield lands and would ensure a cohesive and efficient use of the lands.

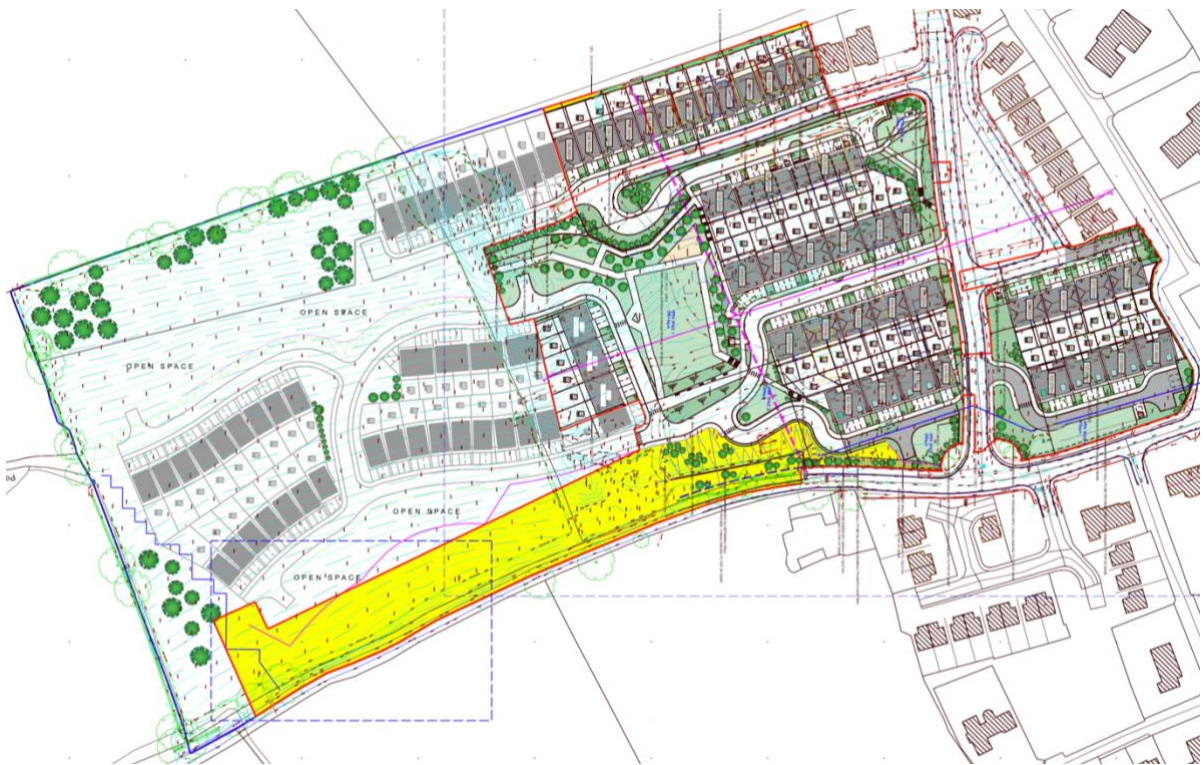


Figure 5 – Permitted Development Layout Ref. 22/504 with indicative layout for future phase 2 development



Where are the vacant or underutilised sites in the settlement? How can the Plan maximise use of these sites?

RECCOMENDATION:

The subject site at Mariner’s Point is opportunely located to provide appropriate residential housing supply within the Wicklow Town – Rathnew settlement boundary.

In addition to the above, we note that it was determined by the Wicklow County Council on 23rd March 2023 (Ref. WW-RZLT-39, refers) that the subject lands fulfil the qualifying criteria for inclusion on the RZLT map for the following reasons:

1. *“The lands in question are included in a development plan or local area plan and is zoned for residential development or zoned for a mixture of uses, that includes residential development.*
2. *The lands are serviced, or it is reasonable to consider may have access to services. Serviced means having access to necessary public infrastructure and facilities including road and footpath access, public lighting, foul sewer drainage, surface water drainage and water supply necessary for dwellings to be developed and for which there is service capacity available sufficient to enable housing to be developed.*
3. *The lands are not affected in terms of its physical condition, by matters to a sufficient extent to preclude the provision of dwellings, including contamination or the presence of archaeological or historic remains.”*

For the reasons outlined above, the subject lands are an appropriate site to bring forward residential development delivering on a number of national, regional and local policy objectives for the area. Residential development on the subject lands would be considered wholly appropriate in an area with existing social and physical infrastructure having regard to the pedestrian links to bus stops, schools and services in Wicklow Town Centre to complete and consolidate the unfinished Mariner’s Point Estate. It is our considered planning opinion, that the subject lands at Mariner’s Point are underutilised and considering the surrounding residential developments, infrastructure and services, the most efficient use of the site would be for residential development which will ultimately form part of a much wider residential offering at the overall development site and ensure the appropriate completion of Phase 1 of the granted development.

We trust the foregoing sets out a reasonable rationale for the appropriateness of the subject site to allow for development to be brought forward in a sustainable manner to promote the provision of housing in a manner that aligns with national, regional and local objectives.





6 Conclusion

Our client welcomed the publication of the Pre-Draft Public Consultation Issues Paper for the Wicklow Town – Rathnew Local Area Plan 2024 and the opportunity to comment on the future development of Maynooth.

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 Draft Wicklow Town – Rathnew Local Area Plan 2024.

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

