



# Draft Wicklow Town – Rathnew LAP Submission - Report

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|-----------------|---------------------------|
| Who are you:    | Agent                     |
| Name:           | Pathway Homes Limited     |
| Reference:      | DWTRLAP-090551            |
| Submission Made | November 20, 2024 9:08 AM |

## Topic

Waterfront Zone Strategy (inc. Murrough south, harbour & port)

## Submission

Please refer to attached submission

## File

Submission on Draft LAP FINAL - 20.11.24.pdf, 0.7MB



'Wicklow Town – Rathnew LAP',  
Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town

Date: 20<sup>th</sup> November 2024

**RE; SUBMISSION ON THE DRAFT WICKLOW TOWN – RATHNEW LOCAL AREA PLAN 2025**

Dear Sir/Madam,

## **1.0 INTRODUCTION**

1.1 On behalf of our client, Pathway Homes Limited, Beldare Group, Beldare House, Harmony Hill, Sligo, F91 Y220, we wish to make a submission on the Draft Wicklow Town – Rathnew Local Area Plan 2025.

## **2.0 CONTEXT FOR SUBMISSION**

2.1 This submission relates in particular to lands at the Murrough, Wicklow Town as identified in Figure 1 overleaf. Our client is actively engaging with Wicklow County Council to advance a high quality residential led mixed use development on this site. Our client is looking forward to ongoing positive and proactive engagement with the planning authority in relation to this site.

2.2 Our clients vision for the development of this site is to achieve the regeneration of the underutilised brownfield industrial site through the delivery of a mixed use community comprising high quality residential development based on the compact growth model, and a mix of commercial uses, all within a highly permeable and legible landscape setting, with connectivity to the waterfront to the east and riverside to the west, and with all development proposals having regard to the close proximity to the European Sites of the Murrough Wetlands SAC and the Murrough SPA.

2.3 Having regard to the emerging development proposals for the site, we have considered extensively the provisions of the Draft LAP and wish to make submissions on a number of points of detail. This points are made in the context of seeking to facilitate a high quality, viable development on the subject lands which will achieve the aspiration for regeneration of these strategic lands.



**Figure 1: Site Location**  
**Source: Google Maps**

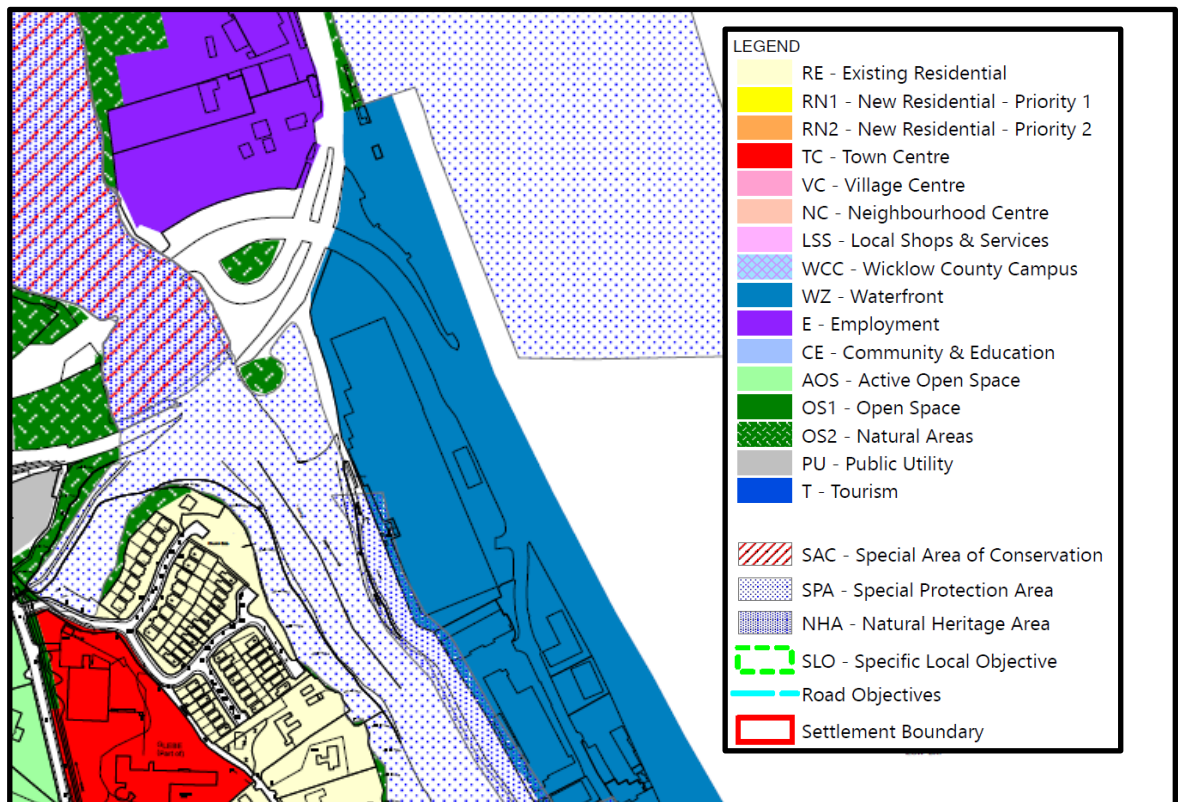
### **3.0 KEY PROVISIONS OF THE DRAFT LAP RELATING TO THE MURROUGH REGENERATION LANDS**

#### **Zoning and Range of Uses**

- 3.1 The subject site is zoned 'WZ – Waterfront' in the Draft LAP, with an objective to *“To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses and to promote and provide for new residential, tourism and other mixed-use development”*.
- 3.2 The description of this zoning objective in the Draft LAP is:

*“To facilitate the continued and more intensive / efficient use of the existing employment, maritime and port uses;*

To maintain existing and support the development / improvement of high quality community, amenity, leisure and tourism uses;  
 To facilitate retail uses at a scale that do not undermine the role of the existing Town Centre;  
 To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities”.



**Figure 2: Wicklow Town Waterfront Strategy Map from Draft LAP**

3.3 In terms of uses appropriate to this zoning, the Draft LAP states that:

*“Uses generally appropriate for waterfront (WZ) zoned land include aquaculture / fishing, residential, childcare, civic / cultural uses, community facilities, education, employment / office uses, general and light industry, harbour uses, health related service / uses, hotels, maritime uses, recreational and leisure uses, retail, restaurants, parking, public house, tourism uses, utility installations and ancillary development in accordance with the CDP and LAP.”*

3.4 Section 11.2 of the Draft LAP provides further detail on uses with Area 3 of the Waterfront zoning:

*“Within Area 3 (Mixed Use Regeneration Area) the following uses are deemed ‘priority uses’ and will be permitted in principle:*

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc*

- will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
  - *High quality community, civic / cultural and recreation uses;*
  - *High quality retail, retail services, restaurants, public house, café”.*
  - *High density residential use where developed in conjunction with other priority uses described above.*

*Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area”.*

### **Key Regeneration Areas**

- 3.5 It is welcomed that the content of the Draft LAP generally supports and encourages regeneration of the lands at the Murrough (south of the Port Access Road). Section 2.3 of the Draft LAP refers to ‘Regeneration Opportunities’, including specific reference to the area around the port access road in Wicklow Town (emphasis added):

*“Key regeneration opportunities include the development of Wicklow port and harbour, served by the port access road, to expand commercial berthing and pleasure craft capacity; redevelopment of the underutilised industrial units in the port and quayside area. There are many opportunities for the densification and enhancement of residential and retail uses in Wicklow town and Rathnew village centres and to improve pedestrian mobility and connectivity. **The regeneration of underutilised brownfield industrial units on the Murrough (south of the Port Access Road Bridge) is a significant opportunity given its location close to the train station and the town centre.** There is also potential for further development of the Wicklow County Campus as a third level education facility for enterprise, education, training, research and development”.*

- 3.6 Section 2.3 of the LAP also articulates solutions to constraints to compact growth, one of which is *“To promote and encourage the regeneration of brownfield sites on the Murrough (south of PAR Bridge) , at the Port and the Quays with a mix of high density buildings and uses including residential and other such uses that provide local job opportunities, and uses that support the existing town centre”.*

- 3.7 Chapter 5 of the Draft LAP states that:

*“Wicklow Town, Rathnew Village and the Waterfront are three areas within the settlement that have huge potential for regeneration, to further develop opportunity sites to enhance compact growth, while creating quality places and reinforcing the identity of the settlement”.*

- 3.8 The Draft LAP, at Chapter 5, sets out a detailed assessment of the Waterfront regeneration area, within which the subject site is located. The regeneration area encompasses the coastal area from the Port Access Road Bridge (Murrough Bridge) and rail-line bridge (Halpin Bridge) to the north, to the south quays of Wicklow harbour.

- 3.9 The Draft LAP sets out the following strategy for the regeneration area:

*“The strategy for Wicklow Town Waterfront is to facilitate regeneration and growth of the port, harbour, quays and Murrough; in order to fulfil the potential of the port as a competitive international cargo port that is a thriving economic hub and a centre of excellence for the off-shore renewable energy sector; to facilitate the regeneration of the Port and Murrough mixed use areas, to create new compact high density urban quarters with a distinctive identity and character within the settlement; to facilitate healthy placemaking by significantly enhancing the recreational, cultural, leisure and amenity potential of the harbour, beach and Murrough park area; that will significantly enhance people’s quality of life through the creation of a healthy and attractive place to live, work, visit and invest in.*

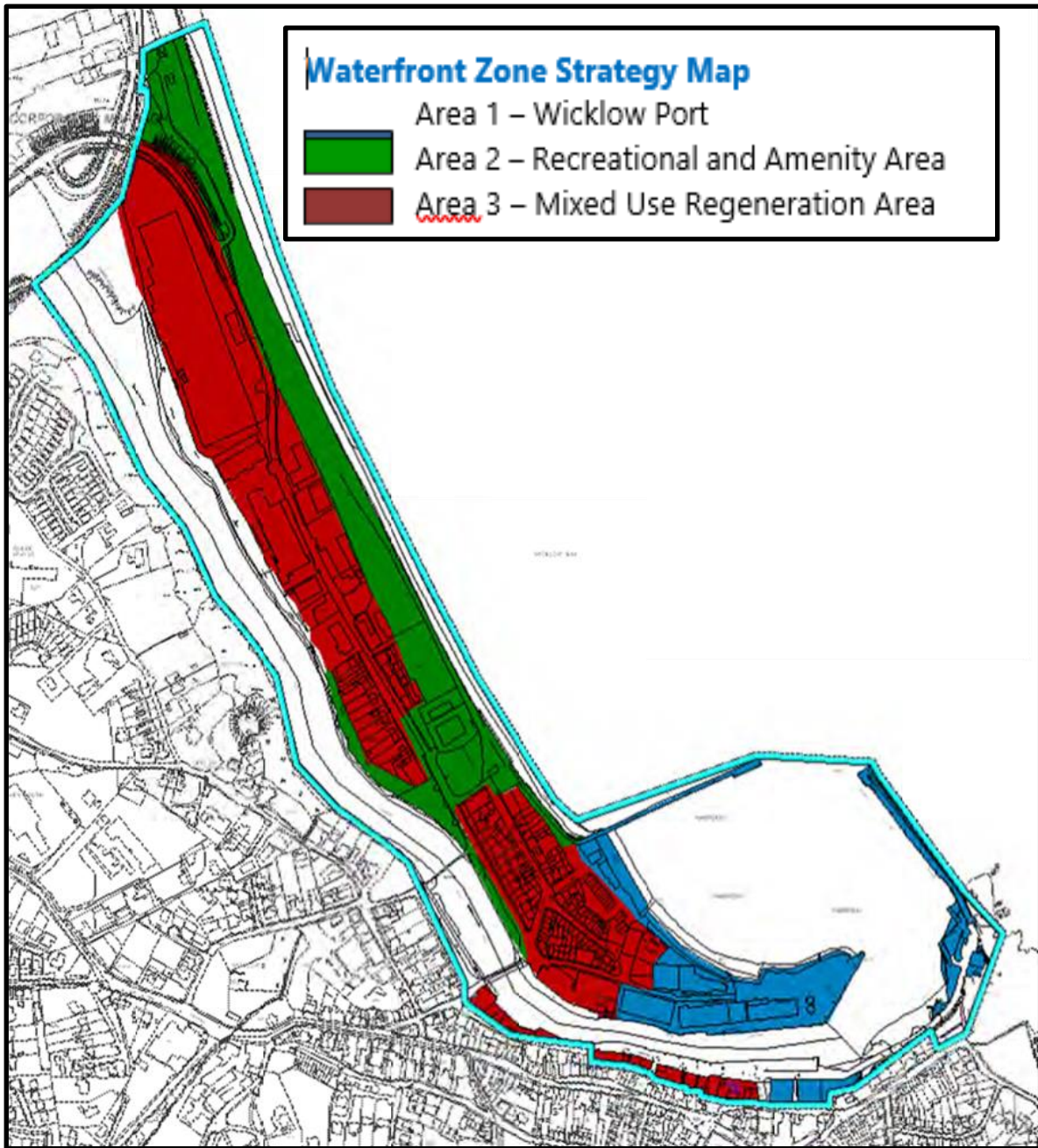
*It is important that the town centre and the waterfront have strong connections, physical and visual, to mutually exploit each other’s assets without compromising their potential or their historical or environmental amenity.*

*To protect the natural heritage of this area ensuring that the conservation objectives of European sites are not adversely impacted upon, either directly, indirectly or cumulatively through any proposal”.*

3.10 The regeneration area is further divided into three areas in the Draft LAP:

- Area 1 – Wicklow Port (including the harbour)
- Area 2 – Recreation and Amenity Area (including the Murrough recreational and amenity area and river bank)
- Area 3 – Mixed use regeneration area (including the Murrough mixed use and Leirim Place, Strand Street, and Castle View).

3.11 The subject site is located within Area 3.



**Figure 3: Waterfront Zone Strategy Map**

3.12 The LAP also includes the following Strategy Map for the Murrough regeneration area.



Figure 4: Wicklow Town Waterfront Strategy Map from Draft LAP

### Central Civic Space

3.13 Objective WTR54 of the Draft LAP is to

*“Seek the provision of a central civic space at the Murrough mixed use regeneration area; surrounded by retail, small enterprise and cultural or civic uses, with clear and legible connections to the surrounding development, the river edge and coast/linear public park”.*

### Tourism

3.14 Objective WTR71 of the LAP is:

*“To positively consider the development of*

- new hotels in Wicklow Town – Rathnew;*
- the development of touring caravan (Aires park) and camping sites (not static mobile home parks) having due regard to surrounding land uses and proper planning and development of the area;*
- the development of hostels along established walking routes and adjacent to existing tourism facilities;*

*the improvement of, and extension to, existing tourist accommodation related developments, subject to the proper planning and sustainable development of the area.*

3.15 Objective WTR72 of the Draft LAP is:



*“To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone including hotel / accommodation facilities and leisure uses to complement the marina and associated boating uses and activities”.*

#### 4.0 GROUNDS OF SUBMISSION

##### Ground 1 – Mix of Uses in Waterfront Area 3

- 4.1 It is recognised that the Waterfront area in Wicklow Town is a key area of the town and has a wide range and mix of uses and functions. The ‘Waterfront’ zoning objective is considered, in principle, to be an appropriate measure and mechanism to guide future development in a part of the town as diverse as this area.
- 4.2 Furthermore, the designation of sub areas within the Waterfront zone is welcomed as a means of providing a further layer of detail on the preferred future development and uses of each of these sub areas.
- 4.3 With regard to Section 11.2 of the Draft LAP, whilst the aspiration to identify priority uses in Area 3 is noted, there is concern that the language used may lead to an interpretation that a single application within Area 3, and only relating to part of Area 3, would or could be required to deliver an extensive range of these uses, and perhaps therefore making a development unviable. It is considered that a strong quantum of residential development in any regeneration proposal is essential, for a number of reasons, including:
- The meet the core strategy housing targets for Wicklow Town and in turn make a contribution to addressing the national housing crisis;
  - To introduce a residential community to the Murrough area, ensuring activity and 24 hour use;
  - To act as a catalyst and vehicle for the delivery of other desirable uses, in conjunction with residential development, such as tourism relating uses, commercial uses and employment uses.
- 4.4 Our client has carried out a significant number of feasibility studies in respect of their parcel of land within Area 3, and to make any development viable, a strong quantum of residential must be included. This in turn allows for the aspirations of the Council in terms of the mixed use vision for the Murrough to be delivered in conjunction with residential development.
- 4.5 In this regard, the following proposed amendment to Section 11.2 is proposed:

*“Within Area 3 (Mixed Use Regeneration Area) **the planning authority will encourage residential led schemes as a means of achieving regeneration of the Area 3 lands and introducing a residential community to the Waterfront.***

*The following non-residential uses are deemed ~~‘priority uses’~~ **suitable uses and will be actively encouraged to be delivered in a mixed use approach in conjunction with residential development** ~~and will be permitted in principle.~~*

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday*

- homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
  - *High quality community, civic / cultural and recreation uses;*
  - *High quality retail, retail services, restaurants, public house, café”.*
  - ~~*High density residential use where developed in conjunction with other priority uses described above.*~~

**It is recognised that Area 3 comprises relatively extensive lands and regeneration is likely to be achieved by way of multiple planning applications. For clarity, each planning application will be required to make an appropriate contribution to delivery of one or more of the above uses, however it is recognised that the preferred range and mix of uses listed above is intended to be delivered across the entire of Area 3.**

*Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area”.*

## **Ground 2 - Hotel Use**

- 4.6 Objective WTR71 of the LAP states that the Council will positively consider the development of new hotels in Wicklow Town - Rathnew. This is noted. It is clear that Wicklow County Council has a desire to facilitate the delivery of a new hotel in Wicklow – Rathnew.
- 4.7 Objective WTR72 of the Draft LAP is then *“To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone including hotel / accommodation facilities and leisure uses to complement the marina and associated boating uses and activities”.*
- 4.8 This is particularly descriptive as to the location of the hotel. It is submitted that if the objective is strictly applied, it has the potential to sterilise the regeneration of the regeneration area at the Murrough.
- 4.9 Fundamentally, a development must be viable for a developer to deliver it. Except for niche or personal projects, there have been no commercial hotel development outside of the five cities in Ireland in the recent past.
- 4.10 Our client has been long aware of the desire of the Council to encourage a hotel development on the regeneration lands at the Murrough. Our client has approached all potential commercial hotel operators and none have expressed an interest in delivering a hotel at this location. The key factor in this is the correlation between development and land costs, which would be similar to those in the cities, versus a lower population catchment, which makes the business case for a hotel unviable.
- 4.11 It is respectfully submitted that land use policy should not be so prescriptive as to the location of a particular niche use such as a hotel so as to potentially sterilise the development of a wider site. The primary focus of the Waterfront zoning objective in the context of the Murrough should be to facilitate regeneration of the lands. An overly prescriptive requirement for a hotel has the real potential to sterilise a mixed use

regeneration on the site. The market must be allowed some flexibility to deliver a mix of uses which are viable, will be occupied and vibrant, and which will deliver long term positive uses in the area.

- 4.12 Having regard to the above, it is submitted that Objective WTR72 of the Draft LAP should be amended as follows:

*“To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone ~~including hotel / accommodation facilities and leisure uses~~ to complement the marina and associated boating uses and activities. **Such uses can be in the form of complementary public open space, active routes and trails, which improve connectivity between the waterfront and the riverside**”.*

### **Ground 3 - Central Civic Space**

- 4.13 Objective WTR54 of the Draft LAP is to:

*“Seek the provision of a central civic space at the Murrough mixed use regeneration area; surrounded by retail, small enterprise and cultural or civic uses, with clear and legible connections to the surrounding development, the river edge and coast/linear public park”.*

- 4.14 Whilst the objective is non-prescriptive in terms of the location of this central civic space, it is respectfully submitted that this is far too prescriptive an approach for the LAP and could unduly influence a logical site layout and urban design approach to the regeneration of the site.
- 4.15 The regeneration of the Area 3 lands in the Murrough already has a significant number of factors which must be taken into account given the site characteristics and location, including:
- How the new development will address the riverside
  - How the new development will address the waterfront to the east
  - How the new development will deliver linkages between the riverside and the waterfront
  - How the new development will deliver an integrated mixed use development
- 4.16 Given the above, any redevelopment of the site will naturally include a series of linkages via open space between the riverside and the waterfront. These linkages will be the natural locations for activation by way of non-residential uses.
- 4.17 An added requirement for a civic space would both be unnecessary and a threat to the viability of a regeneration scheme on the site.
- 4.18 Having regard to the above, it is respectfully submitted that Objective WTR54 should be deleted.

#### Ground 4 – Adjacent Site to the North-West

- 4.19 There is a small portion of land to the north-west of Area 3, and excluded from Area 3. We understand that this land is within the ownership of Wicklow County Council. This site is identified in yellow on the image below.
- 4.20 This portion of land could serve an important function in terms of the future development of Area 3, specifically:
- An area of public open space towards the end of the riverside walk; and
  - An improved link through to the pedestrian bridge adjacent to the railway bridge.
- 4.21 In this respect, it is submitted that the LAP should be amended to include this portion of land within Area 3, with an objective for Wicklow County Council to work with landowners/developers to facilitate the provision of this land for public open space and improved pedestrian and cyclist linkages as part of any proposed regeneration.

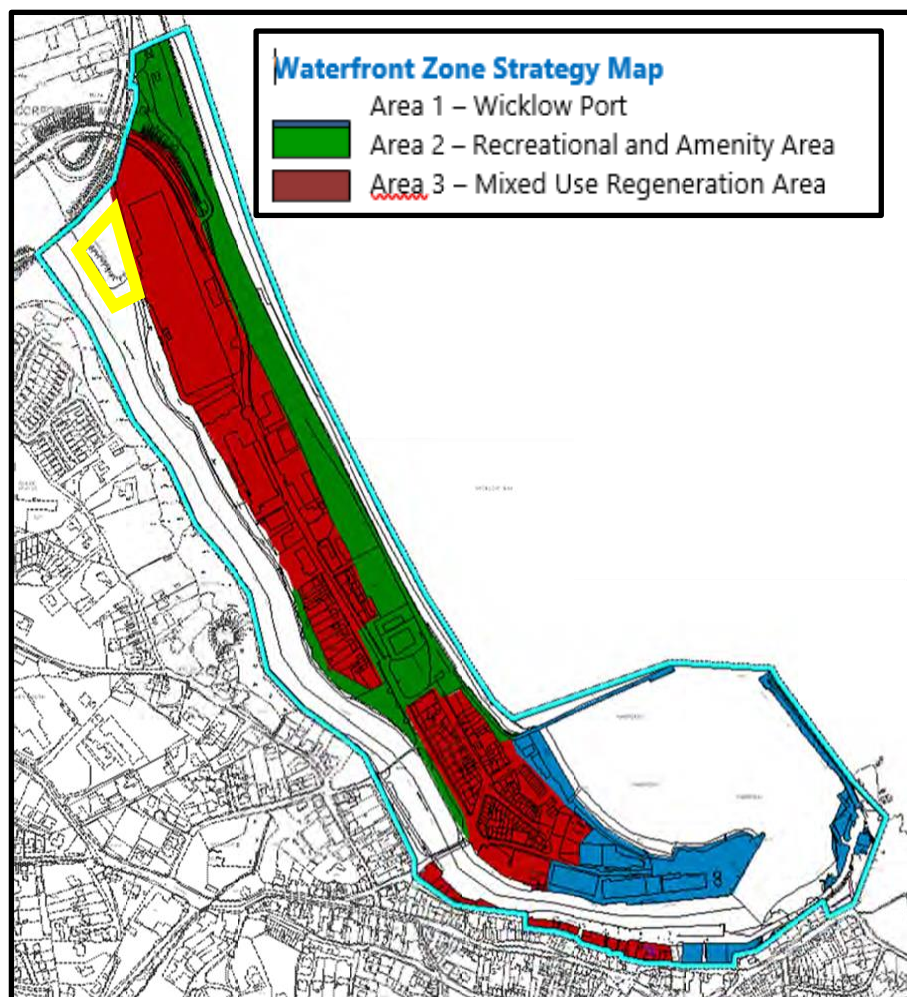


Figure 5: Annotated Waterfront Zone Strategy Map



## 5.0 SUMMARY AND CONCLUSIONS

- 5.1 This submission is made on behalf of our client, Pathway Homes Limited. This submission relates in particular to lands at the Murrough, Wicklow Town, which form part of Area 3 of the Murrough regeneration area identified in the Draft LAP.
- 5.2 Our client is actively engaging with Wicklow County Council to advance a high quality residential led mixed use development on this site. Our client is looking forward to ongoing positive and proactive engagement with the planning authority in relation to this site.
- 5.3 Our clients vision for the development of this site is to achieve the regeneration of the underutilised brownfield industrial site through the delivery of a mixed use community comprising high quality residential development based on the compact growth model, and a mix of commercial uses, all within a highly permeable and legible landscape setting, with connectivity to the waterfront to the east and riverside to the west, and with all development proposals having regard to the close proximity to the European Sites of the Murrough Wetlands SAC and the Murrough SPA.
- 5.4 Having regard to the emerging development proposals for the site, we have considered extensively the provisions of the Draft LAP and respectfully request that Wicklow County Council consider the following amendments to the Draft LAP:

### Range of Uses

- The following amendment to Section 11.2 is proposed:

**“Within Area 3 (Mixed Use Regeneration Area) *the planning authority will encourage residential led schemes as a means of achieving regeneration of the Area 3 lands and introducing a residential community to the Waterfront.***

**The following non-residential uses are deemed ~~‘priority uses’~~ *suitable uses and will be actively encouraged to be delivered in a mixed use approach in conjunction with residential development* and ~~will be permitted in principle.~~**

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
- *High quality community, civic / cultural and recreation uses;*
- *High quality retail, retail services, restaurants, public house, café”.*
- ~~*High density residential use where developed in conjunction with other priority uses described above.*~~

**It is recognised that Area 3 comprises relatively extensive lands and regeneration is likely to be achieved by way of multiple planning applications. For clarity, each planning application will be required to make an appropriate contribution to delivery of one or more of the above uses, however it is recognised that the preferred range and mix of uses listed above is intended to be delivered across the entire of Area 3.**

*Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such*



*as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area”.*

#### *Summary of Reason / Rationale*

- With regard to Section 11.2 of the Draft LAP, whilst the aspiration to identify priority uses in Area 3 is noted, there is concern that the language used may lead to an interpretation that a single application within Area 3, and only relating to part of Area 3, would or could be required to deliver an extensive range of these uses, and perhaps therefore making a development unviable.
- Our client has carried out a significant number of feasibility studies in respect of their parcel of land within Area 3, and to make any development viable, a strong quantum of residential must be included. This in turn allows for the aspirations of the Council in terms of the mixed use vision for the Murrough to be delivered in conjunction with residential development.

#### **Hotel use**

- Objective WTR72 of the Draft LAP should be amended as follows:

*“To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone ~~including hotel / accommodation facilities and leisure uses~~ to complement the marina and associated boating uses and activities. **Such uses can be in the form of complementary public open space, active routes and trails, which improve connectivity between the waterfront and the riverside**”.*

#### *Summary of Reason / Rationale*

- It is respectfully submitted that land use policy should not be so prescriptive as to the location of a particular niche use such as a hotel so as to potentially sterilise the development of a wider site.
- The primary focus of the Waterfront zoning objective in the context of the Murrough should be to facilitate regeneration of the lands. An overly prescriptive requirement for a hotel has the real potential to sterilise a mixed use regeneration on the site. The market must be allowed some flexibility to deliver a mix of uses which are viable, will be occupied and vibrant, and which will deliver long term positive uses in the area.

#### **Central Civic Space**

- Objective WTR54 should be deleted

#### *Summary of Reason / Rationale*

- The rationale for this is to ensure that the layout and urban design of the regeneration site is not unduly influenced by the LAP without full consideration at detailed design stage of all influencing factors for the site.



## Adjacent Site to the North-West

- Extend Area 3 of the Waterfront Zone Strategy Map to include the Wicklow County Council owned small portion of land to the north-west of Area 3 to facilitate the provision of this land for public open space and improved pedestrian and cyclist linkages as part of any proposed regeneration.

### *Summary of Reason / Rationale*

- This portion of land could serve an important function in terms of the future development of Area 3, specifically:
  - a) An area of public open space towards the end of the riverside walk; and
  - b) An improved link through to the pedestrian bridge adjacent to the railway bridge.

Yours faithfully,

*Robert Keran*

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**Robert Keran**

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