



Wicklow Town - Rathnew LAP Submission - Report

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Topic

Other topics for you to have your say on! - Environmental Assessment - Plan Implementation -Plan Delivery

Submission

Please see submission attached.

File

Lands at Tinakilly Rathnew LAP Submission.pdf, 0.74MB

Draft Local Area Plan Submission – Issues Paper Stage



On behalf of

Ardale Property Group

September 2023



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 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 **Tinakilly, Rathnew**.

1.2.1 Tinakilly, Rathnew

The subject site is located at Tinakilly, Rathnew, Co. Wicklow on an overall site area of approximately c.21.4 ha. The site is generally bounded by Tinakilly Country House Hotel and avenue to the north/north east, commercial development and the R750 Wicklow – Rathnew Road and Merrymeeting Interchange to the west/south west; and Knockrobbin Residential Estate to the south.

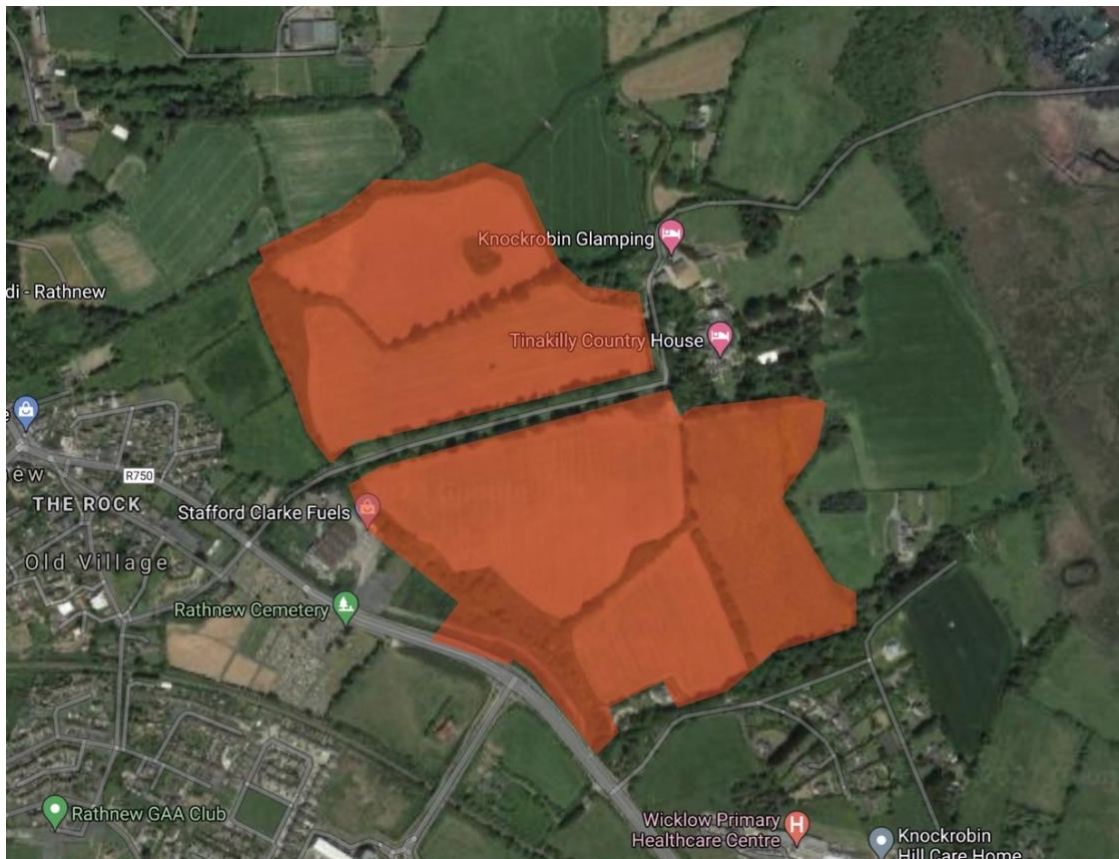


Figure 1 – Ownership Map with Tinakilly site outline in Red

- The subject site forms part of a residential development permitted under Ref. Reg. Ref. 17/219 / ABP Ref. 301261-18 and revised under Refs. 20/1000 and 21/411.
- Construction is ongoing on site for the first phase of development and a planning application is currently under the Planning Authority's consideration for phase 2 of the development (Reg. Ref. 2360219, refers).
- The site is connected to Wicklow Town Centre by existing footpaths and roads. The site has the benefit of access to a variety of existing amenities, educational and commercial facilities and services nearby.
- Tinakilly Country House is located to the north east of the overall site and is a protected structure (Reference No. 25-15 refers).

The site is also included within the Clermont-Tinakilly Action Area Boundary, which has been approved by Wicklow County Council on 20th September 2021.





2 Statutory Planning Context

2.1 National Planning Framework

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:

“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.”*

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.**

The Tinakilly site is a well-established residential zoned site within the settlement boundary of Wicklow Town – Rathnew surrounded by existing and future residential development and is consistent with the policies and intentions of the National Planning Framework.

2.2 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.

We conclude that there are no barriers to residential development at the Tinakilly, Rathnew lands. The lands have the benefit of previously permitted and extant permissions and represents partially completed development. Our client is eager to develop the entirety of their landholding and is evidence by the Phase 2 LRD proposal currently under the Planning Authority’s review under Reg. Ref. 23/60219.

2.3 Wicklow Town – Rathnew Development Plan 2013-2019

Tinakilly - Zoning

The subject site is zoned Residential ‘R1’, Residential ‘R2’, Active Open Space and Passive Open Space. The objectives of the four zonings are set out as follows:

- R1 “New Residential: To provide for new residential development at densities up to 40 units per hectare.”
- R2 “New Residential: To provide for new residential development at densities up to 28 units per hectare.”
- Active Open Space “To preserve, improve and provide for recreational public and private open space.”
- Passive Open Space “To preserve, improve and provide for parks, recreational public and private open space, green corridors and ecological buffer zones.”



The following matrix summarises the various zonings.

Residential - Infill (RIE)	Community/Education/Institutional (CE)	Conservation Zone (CZ)	Action Area	Town Council Boundary
Residential (R1)	Clermont Campus (CC)	Port (PT)	Opportunity Area	Development Boundary
Residential (R2)	Enterprise & Employment (E-1)	Active Open Space (AOS)	Mixed Use (MU)	Future Road Alignment (Reserve free from development)
Residential (R3)	E & E - Warehousing (E2)	Passive Open Space (POS)	Strategic Land Bank (SLB)	Road Improvement
Residential (R4)	E & E - Retail Warehousing (E3)	Neighbourhood Shops and Services (NS)	Public Utilities (PU)	Indicative Pedestrian Walkway
Town Centre (TC)	Village Centre (VC)	Tourism (T)		Park and Ride facility

Figure 2 –Agreed AAP Zoning Map with subject 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 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:

3.1 Theme 6: Other Topics

Area Action Plan

The subject lands at Tinakilly, Rathnew are included within the Clermont-Tinakilly Action Area Boundary, which has been approved by Wicklow County Council on 20th September 2021. We ask that Wicklow County Council take into account the provisions of the approved Action Area Plan and incorporate into the forthcoming Local Area Plan 2024.

We direct the attention to several changes relating to zoning and relief road position as approved. The Wicklow – Rathnew Development Plan 2013-2019 states the following on page 164:

“The position, location and size of the land use zonings shown on the land-use zoning map associated with this plan are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out for the Action Areas below.”

Having considered the above provision, we note that at the design stage of this process, changes were made to the original zoning on the subject site to provide a more viable route for the inner relief road through the Clermont Tinakilly Action Area lands, along with minor changes to the Residential and Open Space zonings that allow for the development potential on the lands to be maximised. The minor changes to the relief road route and zoning on the site was driven by the site topography and other minor constraints. It is noted that the overall quantum of residential and open space zoned lands on the site has not changed from that included in the Wicklow-Rathnew Local Area Plan 2013-2019.

The previous zoning of the site and zoning changes submitted in the Area Action Plan approved by Wicklow County Council are shown below:



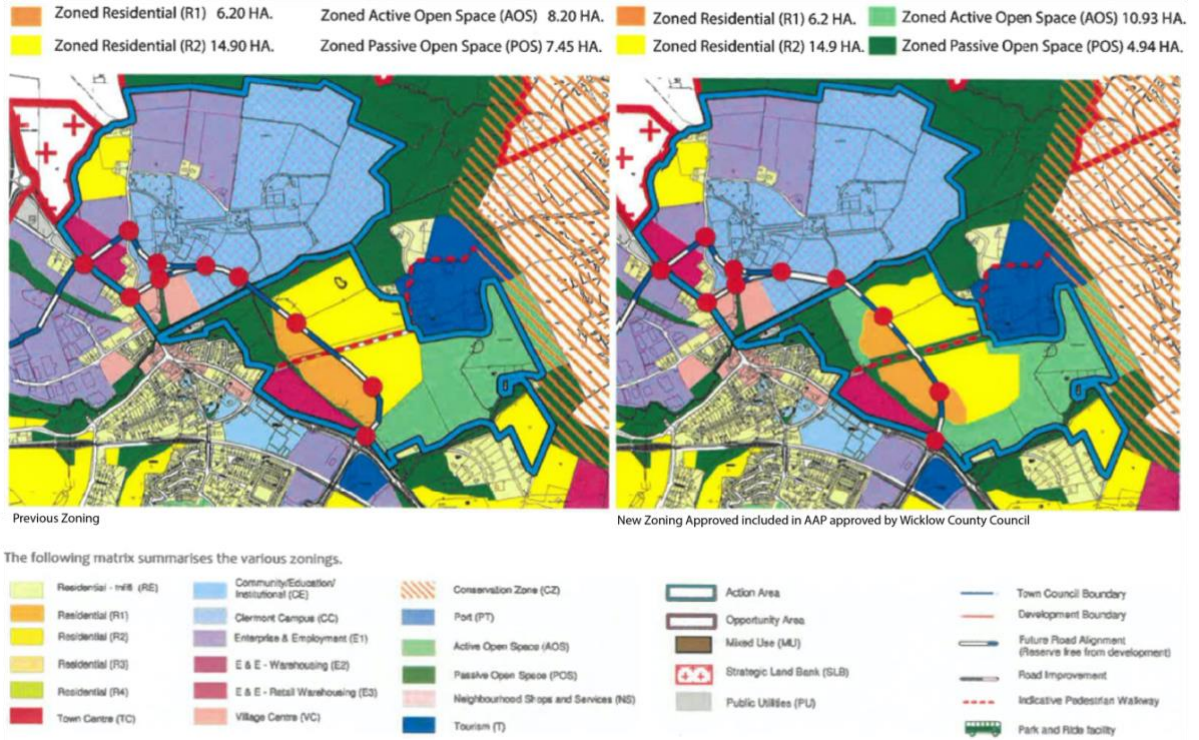


Figure 3 – Amendments to Land Use Zoning as approved by WCC

We ask that the forthcoming Draft Wicklow Town – Rathnew Local Area Plan 2024 is fully aligned with the provisions and land use zoning of the approved Area Action Plan.



4 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.

