

CS CONSULTING
GROUP

CS CONSULTING GROUP

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RZLT

Administrative Officer, Planning Department,

Wicklow County Council,

County Buildings, Whitegates,

Wicklow Town, A67 FW96

Sent By: Post/Online

Job Ref: R016

A - GF

Date: 21-Dec-22

RE: Residential Zoned Land Tax Mapping – Lands at St. Valery's, Fassaroe, Bray, Co. Wicklow

Dear Sir/Madam,

Cronin & Sutton Consulting Engineers (CS Consulting) have been commissioned by [REDACTED] to deliver a submission in respect of the Wicklow County Council Draft Residential Zoned Land Tax (RZLT) Map. This concerns lands in our client's ownership, located at St. Valery's, Fassaroe, Bray, Co. Wicklow, and their status under the RZLT proposals.

The Wicklow County Council Draft RZLT Map (published on the 1st of November 2022) includes these lands among those liable to the imposition of RZLT. However, we submit that these lands do not meet the criteria for inclusion in the RZLT map on the basis that pending improvement works to the N11 national road and M11 motorway preclude the lands' development until such time as a detailed design has been approved for these works.

An application for permission for a residential development of 27no. units on these lands was made to Wicklow County Council in May 2020 (reg. ref. 20/427) and was subsequently refused by the Council. The second reason for refusal was as follows:

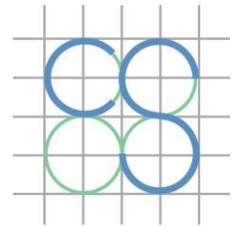
“Objectives TR18 and TR19 of the Wicklow County Development Plan 2016-2022, and Objectives RO1 and RO2 of the Bray Municipal District Local Area Plan 2018 identify the need to support improvements to the national road by reserving corridors free of development that would interfere with provision of such proposals. The site is within the corridor of the N11/M11 Junction 4 to Junction 14 Improvement Scheme which has identified upgrades to this route. It is considered that development of the kind proposed would be premature pending the determination of a road layout for the area or any part thereof and would materially

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contravene objectives TR18, TR19 of the County Development Plan 2016-2022, and objectives RO1 and RO8 of the Bray Municipal District Local Area Plan 2018. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area."

In its submission to Wicklow County Council on this planning application, the Kildare National Roads Office (KNRO) gave the following comments in relation to the N11/M11 scheme:

"The proposed development is located within the constraints study area for the N11/M11 Junction 4 to Junction 14 Improvement Scheme. The site is located to the West of the N11 at Kilcrouney Cross and is within an area under consideration for the development of scheme options at this time. As such, any proposed development in this area is deemed premature at this stage."

A Phase 2 Option Selection Report for the N11/M11 Junction 4 to Junction 14 Improvement Scheme was published in December 2021. This identified a preferred N11/M11 alignment corridor that follows the existing road alignment. Any development of the subject lands would therefore have to be integrated with the final improvement works design for this section of the national road network.

Detailed design works for the N11/M11 Junction 4 to Junction 14 Improvement Scheme have however not yet commenced, and a project update published in January 2022 stated that *"funding is not available to Wicklow County Council to advance the N11/M11 Junction 4 to Junction 14 Improvement Scheme to the next phase of development at this time"*. As such, this roads scheme is effectively in abeyance until such time as further funding is allocated.

In consequence, our client's lands at St. Valery's cannot be developed until the N11/M11 Junction 4 to Junction 14 Improvement Scheme is progressed further. We therefore request that these lands be removed from the Wicklow County Council Residential Zoned Land Tax (RZLT) Map.

Gordon Finn BA BAI MAI MIEI

Civil and Traffic Engineer

for Cronin & Sutton Consulting



County Wicklow Residential Zoned Land Tax (RZLT)

Submission Template

A: Details of person / representative / agent making submission

Name	[REDACTED]
Address	[REDACTED]
Phone No.	[REDACTED]
Email Address	[REDACTED]

If you are the landowner of the lands that are the subject of this submission, or making the submission on behalf of the landowner, please complete Part (B) of this form.

If you are not the landowner of the lands that are the subject of this submission or making the submission on behalf of the landowner, (i.e. you are a 'third party') please complete Part (C) of this form.

Please be advised that personal information will be redacted before publishing.

B: Landowner Submission

Town	Wicklow
Landowner name	[REDACTED]
Landowner address	[REDACTED]
Landowner phone	[REDACTED]
Landowner email	[REDACTED]
Address of site	St. Valery's, Dargle Valley, Fassaroe, Kilcrouney, Bray, Co. Wicklow.
Site description	The site is bounded by the N11 to the east and Enniskerry Road (R117) to the south and is located within the curtilage of St. Valery's House, a Protected Structure, under the Wicklow County Development Plan, 2016 - 2022 (Reference: 03-34).
Site Area	See attached plan, c 13 acres

Maps / information to accompany submission	Check
Have you included the required Ordnance Survey map showing the lands at an appropriate scale i.e. 1:1000 in urban areas or 1:500 in rural area, clearly identifying the map in question?	Yes
Have you included proof of ownership?	No

Are you:	Check
Challenging the inclusion of certain lands on the map?	Yes
Challenging the date that lands are considered to be 'in scope'?	NA
Requesting a change in zoning?	No
Identifying additional lands that you believe should be shown on the maps?	NA

Grounds for your submission

Please see attached letter from CS Consulting, in summary it is in regard to the site being within the corridor of the N11/M11 Junction 4 to Junction 14 improvement Scheme which has identified upgrades to this route. It is considered that development of the kind proposed would be premature pending the determination of a road layout for the area or any part thereof and would materially contravene objectives TR18, TR19 of the County Development Plan 2016-2022, and objectives RO1 and RO8 of the Bray Municipal District Local Area Plan 2018. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.". On that basis the lands should be excluded from RZLT.

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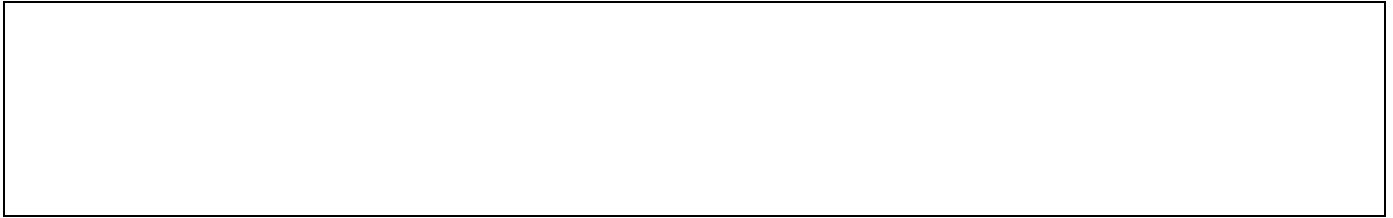
C: Third Party Submission

Town	
Landowner name	(if known)
Landowner address	(include Eircode if known)
Landowner phone	(if known)
Landowner email	(if known)
Address of site	(include Eircode if known)
Site description	(if address is unclear)
Site Area	(if known)

Please include a map if available
 Please be advised that where we cannot identify the land we may not be able to take your submission into account.

Are you:	Check
Challenging the inclusion of certain lands on the map?	
Challenging the date that lands are considered to be 'in scope'?	
Identifying additional lands that you believe should be shown on the maps?	

Grounds for your submission (please see advice at end of this document)
 (you can set out grounds on this form, or attach a separate document)



Criteria for inclusion on the map - any submission to exclude or include land should make reference to these criteria:

Land that meets the criteria for inclusion on the map, and therefore liable to the RZLT, is land that –

- is 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.
- is serviced, or it is reasonable to consider may have access to services. Serviced means having access to the 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.
- is 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.

but which is not –

- land that, while zoned residential, is an authorised development used to carry on a trade or profession by a business liable to pay commercial rates, and which provides services to residents of adjacent residential areas.
- land that is zoned for a mixed used purpose (including residential) unless it is reasonable to consider that such land is vacant or idle.
- land that is required for, or occupied by, other uses such as social, community or governmental infrastructure, including education and healthcare facilities, facilities used for the purposes of public administration, transport facilities and infrastructure, utilities, energy or telecommunications infrastructure and facilities; water and wastewater infrastructure and facilities, waste management and disposal infrastructure, recreational infrastructure including sports facilities and playgrounds.
- land that is subject to a statutory designation that may preclude development.
- land in respect of which the Derelict Sites Levy is payable.

NOTE
 ALL DIMENSIONS TO BE CHECKED ON SITE
 NO DIMENSIONS TO BE SCALED FROM THIS DRAWING
 THIS DRAWING IS TO BE READ IN CONJUNCTION WITH
 RELEVANT CONSULTANTS DRAWINGS

Output Format:
 RASTER
 Output File:
 R_00_25278047_00000002.dwg

Map Series:
 1:1000
 3568-22
 REVISION DATE = 30-Mar-2016
 SURVEY DATE = 31-Dec-1978
 LEVELLED DATE = 31-Dec-1977

3568-17
 REVISION DATE = 30-Mar-2016
 SURVEY DATE = 31-Dec-1978
 LEVELLED DATE = 31-Dec-1977

3617-02
 REVISION DATE = 30-Mar-2016
 SURVEY DATE = 01-Nov-1997
 LEVELLED DATE = 31-Dec-1977

1:2500
 3568-C
 REVISION DATE = 30-Mar-2016
 SURVEY DATE = 31-Oct-2000

3617-A
 REVISION DATE = 30-Mar-2016
 SURVEY DATE = 31-May-2000

Raster Extent:
 LLX,LLY = 724112,717029
 LRX,LRY = 724935,717029
 ULX,ULY = 724112,718041
 URX,URY = 724935,718041

Projection:
 ITM
 ITM Centre Point Co-ordinate:
 X,Y = 724524,717535

Extraction Date:
 26-Oct-2016

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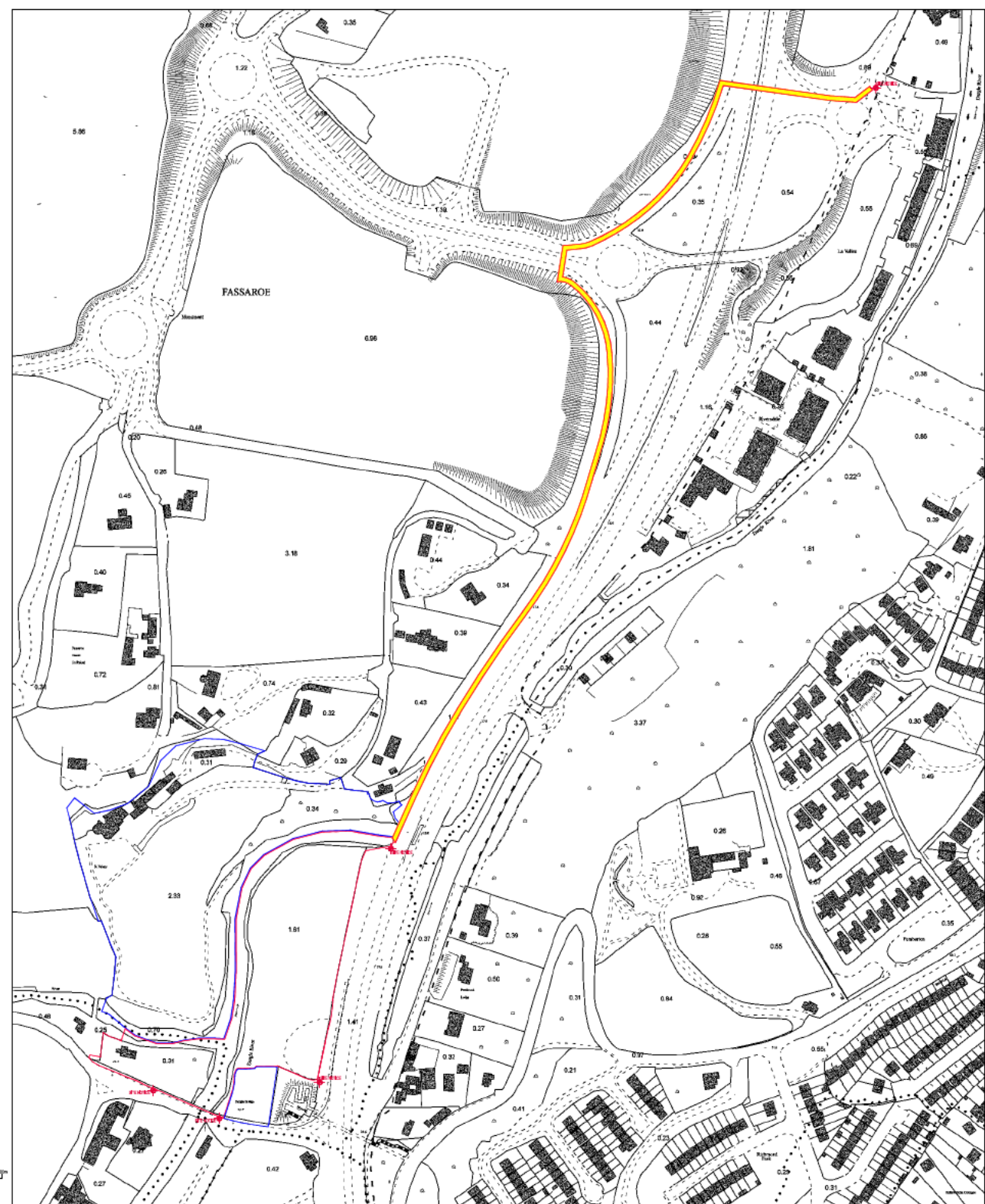
Gach cead ar cosnamh. Ní ceadmhach aon
 chuid den fhóilséachán seo a chóipeáil, a
 atáirgeadh nó a tharchur in aon fhorm ná ar
 aon bhealach gan cead i scríbhinn roimh ré ó
 úinéir
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 ar
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 fríscúla.
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-  SITE NOTICE (5 No. TOTAL)
-  SITE BOUNDARY
-  ADJOINING OWNERSHIP BOUNDARY
-  RIGHT OF WAY



OSI Licence (Order) No:
 25278047
 Scale: 1:2500

REV	DATE	DESCRIPTION	CHKD	DRN
A	2016 11 04	Based for Planning	PHB	JZ

PLANNING

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Client: [Redacted]

PROJECT
 HOTEL AT ST. VALERY'S, FASSAROE
 KILCRONEY, BRAY, Co. WICKLOW

JOB NUMBER:	85-0272
DATE:	MARCH 2016
SCALE:	1:2500 @A1
DRAWN:	JZ
CHECKED:	PHB
FILE NAME:	85 0272 P 0001 Site Location Plan

DRAWING
 PROPOSED SITE LOCATION PLAN

BLOCK	DRAWING NUMBER	ZONE	REVISION
	P0001		A

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