



# Draft Wicklow Town - Rathnew LAP Submission - Report

<b>Who are you:</b>	Agent
<b>Name:</b>	Knockrobbin Developments Limited
<b>Reference:</b>	DWTRLAP-103018
<b>Submission Made</b>	November 7, 2024 10:35 AM

## Topic

Land Use Zoning Map

## Submission

see attached submission, which updates and replaces our client's submission dated 31 October 2024 - we spotted a couple of errors on page 4 after it was submitted.

kindly acknowledge safe receipt.

## File

Draft LAP Sub 07.11.2024.pdf, 0.64MB

MOLA Drg. No. 01001.pdf, 0.61MB

07 November 2024

'Wicklow Town – Rathnew LAP'

Administrative Officer

Planning Section

Wicklow County Council

Station Road

Wicklow Town

**Re: Draft Wicklow Town – Rathnew LAP 2025**  
**LANDOWNER SUBMISSION**

Dear Sir or Madam,

This is a submission in respect of the Draft Wicklow Town-Rathnew Local Area Plan 2025 ("the draft LAP") on behalf of **Knockrobbin Developments Ltd., Mill House, Ballyclough, Limerick, V94 W5YE**.

Our client owns c 6.47 hectares of land at Bollarney North, Wicklow, which is outlined red on the attached aerial image (see also Folio WW32872F). Save a small plot to the south of the road, the land is wholly situated north of the R999 Drumkay Road (also known as the Port Access Road). Unless otherwise stated, this submission only relates to the land north of the Port Access Road.

In the draft LAP, our client's land is identified for four land uses namely:

- RE - Existing Residential (0.64 ha.),
- RN2 - New Residential - Priority 2 (4 ha.),
- CE - Community and Education (1.08 ha.), and
- OS1 - Open Space (0.55 ha.).

For ease of reference, these lands are shown on the attached MOLA Drg. No. 01001. This submission only relates to the RN2, OS1 and CE lands within our client's ownership. Our client has already initiated pre-application consultation with the Council (ref. LRD PP24/16 refers) to develop these lands. Save the RE zoning, the rest of the lands are within SLO4 – Bollarney North, which extends to c. 11.2 hectares comprising RN2 (6.9 ha.), OS1 (3 ha.), CE (1.16 ha.), and Car Parking (0.14 ha.). We understand the lands within SLO4 are owned by at least three unrelated parties.

When compared with the land use zoning provisions in the LAP 2013-2019, there is a significant reduction in the amount of our client's land identified for immediate residential development (2.5 ha. versus 0.64 ha.) but with an overall increase in residential zoned land (2.5 ha. versus 4.64 ha.). The previous incompatible E&E Warehousing (E2) land use has been replaced by a combination of RN2, CE and OS1 land uses.

The Council is requested to effect the following changes as proposed amendments to the draft LAP as it relates to their RN2 and OS1 land and SLO4:

- (i) **Re-zone 4.55 Ha. from RN2 and OS1 to RN1 as shown on the attached site plan.**

As proposed in the draft LAP, there are 9 no. RN1 zoned sites to meet the current housing and population targets. Only 8 no. sites appear to be identified for RN1 on Map No. 1 and of these, 4 are owned by the Council, two at Marlton are owned by the same developer, and site at Tinakilly Park extends to 11 hectares (or just under **one-third of the entire RN1 zoned land** per Table 3.1). While it is noted that four of the eight sites are active (i.e. planning is being sought, is in place or part of the site is under construction), there are **effectively only 3 no. private developers** identified to build houses in Wicklow Town. This is an **insufficient number of different landowners to create a functioning housing market in the Town**. The proposed re-zoning would add a further landowner that could immediately provide residential development thus increasing the market.

The 11 ha. of RN1 lands at **Tinakilly Park equate to c. 33% of the total RN1 lands** in the Draft LAP, so as long as that land remains undeveloped, **the 75% threshold per WTR4 in the Draft LAP cannot be exceeded**. As a result, all the RN2 lands would remain undeveloped. In other words, the developer at **Tinakilly Park has a stranglehold over the entire residential market in Wicklow Town**, which would not be the intention the Council and would be contrary to the proper planning and sustainable development of the area.

In addition, there is a planning permission (ref. 22/837) being implemented for **365 no. units on c. 25.8 Ha. at Tinakilly Park**, which will take many years to implement thus further strengthening the dominant position of the developer at Tinakilly Park to the detriment of all other landowners with residential zoned land be it existing residential, RN1 or RN2.

The proposed **RN1 lands within SLO4 are fully serviced** (with foul drainage, surface water drainage, and water supply), and the Port Access Route provides excellent connectivity for pedestrians, cyclists (two-way cycle routes on both sides of the road) and vehicles. The Council is reminded **our client ceded lands to them to facilitate the construction of the Port Access Route under a developers' WCC agreement** to provide for residential development of the proposed RN1 lands within SLO4.

**Wicklow Train Station is less than 300 metres** away as 'the crow flies' and is currently c. 1 km on foot via a pathway from the R999 over the railway line and along the eastern boundary of Bollarney Woods and the R750 (see dashed orange line and arrow on the attached aerial image). Wicklow Town Centre is within 650 metres of the site and direct connectivity to it will be established through the proposed park and ride and future pedestrian link to the train station, which will be directly opposite the site on the Port Access Route (**Per Transportation Objective WTR77**).

This proposed re-zoning would reinstate the R2 land use zoning per the LAP 2013-2019 on our client's land and provide for additional RN1 zoned lands at Bollarney North on lands that were previously zoned for residential development in the Wicklow Town Environs/Rathnew Plan 2008-

2014. **Planning permission was previously granted** by Wicklow County Council and Wicklow Town Council for the coordinated development of these lands for 315 no. residential units, so the suitability of them for residential development has been previously established. Having regard to the latest density guidelines, it is anticipated that our client's land could accommodate up to 250 no. residential units. Pre-application consultation has already taken place with the planning authority (Ref. LRD PP24/16 refers) that demonstrates our client's development intentions.

This proposal would result in the provision of 4.55 ha. of RN1 zoning within SLO4 at Bollarney North. However, it is submitted to the Council that it is not necessary to also de-zone other RN1 lands to redress/maintain the current provision as set out in the draft plan. The reason we believe this is not required is because of the four active sites, the densities of the proposed and approved developments are 28.1 uph (ref. 201296), 28.2 uph (ref. 24176), 31.7 uph (ref. 24311), and 23.75 uph (ref. 23854) thus well below the density range set out in the Sustainable Residential Development Compact Settlement Guidelines.

(ii) **Delete the second bullet point provision in SLO4 which is:**

"A minimum of 1.2 ha on lands zoned CE shall be provided for community uses. Generally this shall comprise a community/sports/recreation type development of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and engagement with the Planning Authority."

It is our client's preference to provide education uses normally allowed under CE zoning as opposed to a just community/sports/recreation type development that is being promoted in SLO4. **By omitting this bullet point provision, the CE land use objective provides for a broader range of uses compatible with the land use zoning and land use matrix in the Draft LAP without preventing the possibility of a community/sports/recreation type development.**

(iii) **Amend the fourth bullet point provision in SLO4 to read as follows:**

"To provide a linear route for walking and cycling, with a minimum width of 8 metres and a maximum width of 10 metres within the public open space lands on the lands zoned RN1 with pedestrian/cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly."

**Subject to it being provided within the public open space as part of a residential development as opposed to the alignment being fixed within a linear track of OS1 zoned land on the edge of a residential development, our client is supportive of providing this active travel infrastructure.**

*Summary and Recommendation*

Our client broadly welcomes the proposed zoning changes at Bollarney North but invites the Council to

- (a) re-zone 4.55 ha. land from RN2 and OS1 to RN1
- (b) to provide for the **immediate delivery of housing and education** facilities and to increase the residential market at Wicklow Town.
- (c) Allow green parkway area to be included in development 15% green provision

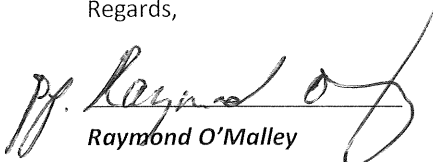
The lands at Bollarney North are suitable for immediate residential development **being fully serviced** with public drainage, water supply, excellent access at the Port Access Road, and it's close to **public transport** at Wicklow Train Station.

The provision of medium density (50 uph) residential development at Bollarney North utilising the existing direct pedestrian connectivity to the **train station**, Station Road, and Wicklow Town, would reduce or avoid the need for travel by private car, and it would aid a shift to more environmentally friendly modes of transport. Further, the development by the Council of the planned **Park and Ride** as set out in the draft LAP in advance of the line upgrade to **DART** services will improve access to sustainable transport and provide a direct access to the train station and Wicklow Town centre.

We invite the Council to propose the above changes as proposed material amendments to the draft LAP as part of its assessment of the draft Wicklow Town-Rathnew LAP 2025 to create a more sustainable and vibrant Wicklow Town for people to live, work and visit.

Please acknowledge receipt of this submission.

Regards,



**Raymond O'Malley**

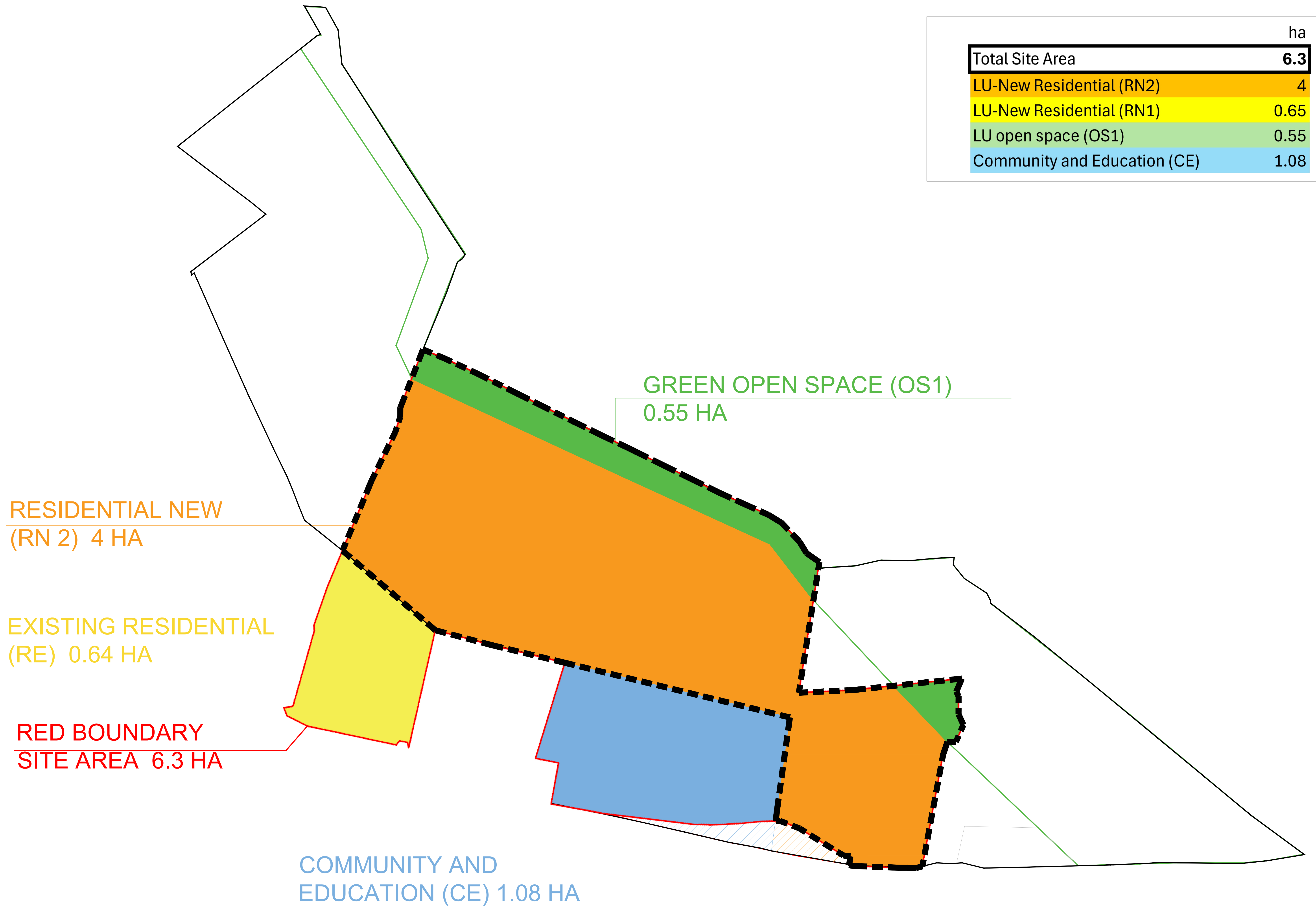
Kieran O'Malley & Co. Ltd.

ROM: rom

Encl

**Enclosure:**

1. MOLA DRWG. No. 01001 Site Boundary – Land Use Zoning Map



	ha
<b>Total Site Area</b>	<b>6.3</b>
LU-New Residential (RN2)	4
LU-New Residential (RN1)	0.65
LU open space (OS1)	0.55
Community and Education (CE)	1.08

RESIDENTIAL NEW  
(RN 2) 4 HA

EXISTING RESIDENTIAL  
(RE) 0.64 HA

RED BOUNDARY  
SITE AREA 6.3 HA

GREEN OPEN SPACE (OS1)  
0.55 HA

COMMUNITY AND  
EDUCATION (CE) 1.08 HA

KEY PLAN (not to scale):

Rev.	Date	Description

**MOLA**  
2 Derrynbrook Road,  
Dunmoying,  
Dublin 4, Ireland  
Telephone: +353 1 218 3900  
www.mola.ie

Notes:  
Do not scale.  
Use figured dimensions only.  
This drawing is to be read in conjunction with all relevant specifications and drawings.  
All drawings to be checked on site.  
In the event of any discrepancies between drawings, the contractor is to inform the architect immediately.  
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Stage:	PRE-PLANNING
Client:	XXX
Project:	BOLLARNEY NORTH, WICKLOW
Drawing:	LAND USE ZONING OBJECTIVE 2025- SITE BOUNDARY
Date:	10/2024
Scale:	1:1000 @ A0
Sheet:	24044
Drawn by:	23044 - MA - xx - XX - xx - A - xx - 01001
Check:	1

For illustration purposes only