



## Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Broomhall Estates Limited
Reference:	DWTRLAP-115224
Submission Made	November 20, 2024 11:58 AM

### Topic

Land Use Zoning Map

### Submission

Please see submission attached.

### File

Broomhall Estates Limited Submission.pdf, 1.1MB

Wicklow Town – Rathnew LAP,  
Administrative Officer,  
Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67 FW96

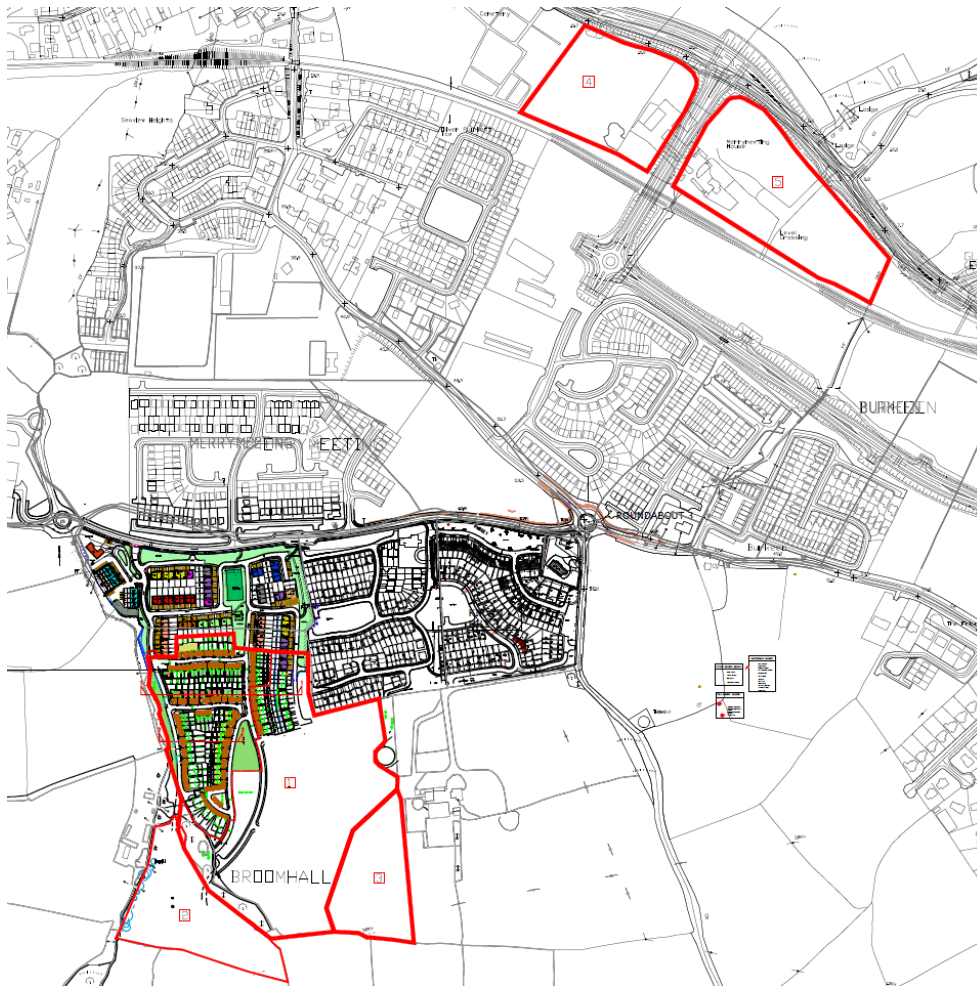
20<sup>th</sup> November 2024

**Re: Submission to the Draft Wicklow Town – Rathnew Local Area Plan 2025  
Lands at Broomhall Townland, Rathnew, Co. Wicklow**

Dear Sir/Madam,

On behalf of Broomhall Estates Limited, Ballyfree House, Glenealy, Wicklow owners of lands identified in Figure 1 below, we wish to make a submission in respect of the Draft Wicklow Town – Rathnew Local Area Plan 2025 (WRLAP).

Broomhall Estates Ltd have been actively developing lands in the northern Wicklow-Rathnew area, particularly around the Broomhall area since 2002. A long-term plan for development of the area was conceived along with the construction of the Wicklow Port Access Road and Wicklow Town Relief Road, the provision of improved urban physical and social infrastructure, residential and commercial development.

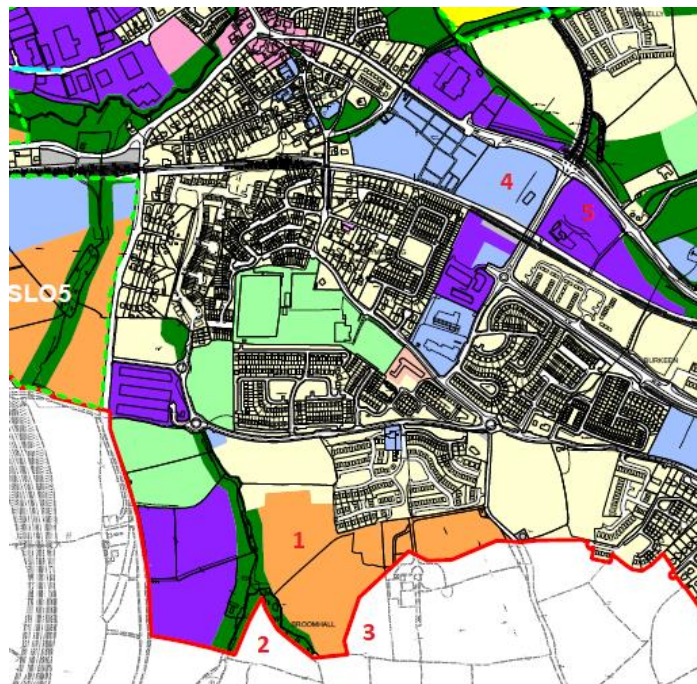


**Figure 1 Lands Owned by Broomhall Estates Limited Outlined in Red**

## **Introduction**

As indicated in the draft zoning map extract shown below, the residential lands are clustered in the Broomhall area of Rathnew, where a strong neighbourhood has been developing over the past two decades.

In tandem with the residential developments delivered to date and currently under construction, Broomhall Estates Ltd have provided infrastructure such as Saunders Lane Road, upgrades to Friars Hill Road, a neighbourhood centre, known as the Merrymeeting Shopping Centre and a water reservoir tank in agreement with Irish Water to service the area. In addition to this, Broomhall Estates Ltd have contributed to improving the social infrastructure in the area by providing 3 no. creches, sites for 2 no. schools, a site for a Business Park and 2 no. playing pitches to the local GAA and Soccer Clubs.



**Figure 2 Extract from the WRLAP Zoning Map with Sites Identified**

This submission relates to a request for a zoning change on a number of sites under the ownership of Broomhall Estates Limited. For ease of reference the sites have been numbered 1-5 as shown in Figures 1 and 2 above.

### **Planning and Development Act 2024**

The Planning and Development Act 2024 has been approved by the Oireachtas and signed into law by the President. One of the key changes to be implemented in the new Planning Bill is for longer term, more strategic, ten-year plans for Local Authorities. This means that the WCDP, as adopted, would require to be updated to project population and housing figures for a 10-year period, not the current 6-year period.

The WRLAP sets out to plan to the 2031 population projection, however, it should make population expansion provisions for a longer strategic perspective so that there is no repeat of the stop-start micro-management of the expansion of the Key County town to allow it to prosper at the highest level of the urban hierarchy in the Core Region Area. More ambitious population and housing targets should be considered for the WRLAP.

## **Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities**

The Compact Settlement Guidelines were introduced in January 2024 and therefore are not included in the Wicklow County Development Plan, which was implemented in 2022.

The Compact Settlement Guidelines focus on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth. The Guidelines support the logical expansion of towns and settlements, which is applicable to the subject lands referred to in this submission.

### **Poly-Centric Development**

Not all towns are mono-centric. Wicklow – Rathnew is an example of a poly-centric town, which is evidenced in the name of the LAP itself. The overall WRLAP map shows the linear nature and the poly-centric form of the extended urban area.

There is now policy concentration on the 15-minute, walkable neighbourhood concept and in an urban area with a linear form there is strong policy justification to provide neighbourhood centres with critical mass for viability of services and sustainable, active movement at close quarters.

Therefore, there is a case for a poly-centric approach to urban land-use zoning and for cores to be identified, such as at Rathnew, where the continuation of planned, logical expansion of residential accommodation can occur in the near-time, close to already developed and identified employment zones where appropriate infrastructure has already been provided.

The option to develop dual cores is recognised in the Vision and Strategy set out in Section 2 of the draft plan, including the following: -

The solution adopted in this plan has a number of elements:

- Consolidate the existing built pattern in Wicklow Town by maximising the development potential of large sites close to the core and any infill sites and backland sites along the main roads within the town core of Wicklow;

- To provide a framework for the future development of Wicklow Town Centre and Rathnew Village to facilitate the development of these core areas as the centre / focus of the settlement. To enhance the public realm in these centres and enhance connections and linkages to the residential areas surrounding the centres as well as connecting Wicklow Town Centre to the Quays/Harbour and the Murrough and also connecting Rathnew village to Wicklow County Campus at Clermont;
- To encourage the development of an appropriate mix of uses in Rathnew core, particularly that which can contribute towards creating a more defined village centre and village streetscape.

## Population Growth

The population of Wicklow Town and Rathnew in 2022 was 16,500 persons (CSO). The 2022 County Development Plan set out the following population / housing targets;

**Table 2.1 Population growth & targets Wicklow Town – Rathnew**

Wicklow Town - Rathnew	2016 Census	2022 Census	Q2 2028 Target	2031 Target
<b>Population</b>	<b>13,954</b>	<b>16,439</b>	<b>18,515</b>	<b>19,400</b>
<b>Housing</b>	<b>5,456</b>	<b>6,231</b>	<b>7,573</b>	<b>7,850</b>

This plan will ensure adequate zoned land and supporting objectives to allow for the housing targets, as set out in the County Development Plan prevailing at the time of the adoption of this LAP, to be met.

## Wicklow County Development Plan 2022 – 2028(WCDP) – Relevant Extracts

Wicklow and Rathnew are Level 2 ‘Key Town’ settlements in the Core Region of the Eastern and Midlands Regional Spatial and Economic Strategy (RSES) of Ireland and they are targeted for a high level of growth.

Wicklow is also 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. Settlements within the catchment of Wicklow Town include Rathnew, Ashford, Glenealy, Roundwood, Rathdrum and a significant rural population. Within the settlement, Rathnew has a distinct identity and functions as a local service centre for its local community.

Wicklow-Rathnew is a major employment hub in the County, with a strong employment base attracting inflows of workers from around the County. The largest sectors in the settlement are commerce, manufacturing and education / health / public administration. There are a number of active business and industrial parks, with potential for expansion, as well as a supply of undeveloped zoned employment land available for growth. The County town also provides tertiary educational facilities at the Wicklow County Campus at Rathnew (in conjunction with Carlow IT – now SETU) and higher order health facilities at Knockrobin Primary Health Centre.

Regional Policy Objectives : Wicklow – Rathnew Key Town	
RPO 4.54	Support an enhanced role and function of Wicklow-Rathnew as the County Town, particularly as a hub for employment, training and education.
RPO 4.55	Support Wicklow-Rathnew's role in the provision of third level education at the Wicklow County Campus Rathnew (in association with Institute of Technology Carlow) and in particular, to support the development of the campus as a hub for the Film Industry and Screen Content Creation Sector.
RPO 4.56	Support enhancement and expansion of Wicklow Port and Harbour, to expand commercial berthing and pleasure craft capacity subject to a feasibility study with particular focus on avoiding adverse impacts on the integrity of adjacent European Sites.
RPO 4.57	Support the development of Wicklow-Rathnew as a tourism hub having regard to its accessibility to key tourist destinations in the Region.
RPO 4.58	To support ongoing investment in rail infrastructure to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity.

### Summary of Statutory Plan Policy

The significance of Wicklow Town – Rathnew and the importance of its expansion is demonstrated in the extracts above from the WCDP.

The timeframe for achievement of the Vision and Solution of the strategic growth concept is simply too short and the targets represent a significant undershoot of sustainable future development in accordance with medium term strategy, particularly for the successful core at Rathnew.

### Summary of Recent Strategic Planning for Wicklow – Rathnew Area

Strategic planning for the expanded Wicklow Rathnew urban area extends back to before 2000. In 2001, the Wicklow Environs LAP provided a long-term strategic development structure for the area and from 2006 onwards, Action Area Plans were prepared for sub-sectors.

These plans were followed by subsequent LAPs, with the most recent LAP being from 2013-2019, with the earlier Action Area Plans incorporated. Following the introduction of the 2013-2019 LAP, a Socio-Economic Profile for Wicklow-Rathnew was prepared in 2015. A Commuter Analysis Report was commissioned in 2019 and these documents informed the preparation of the WCDP strategy for economic development.

The WCDP acknowledges that it is necessary to provide accessible residential accommodation to assist in the integrated planning for population and for major employment growth of all types, administrative, health, education, industrial/commercial etc. in an important employment town in the county/region, as identified in the RSES and CDP. It is not apparent that this has been done in the draft WRLWP.

## **Subject Sites**

### **Site 1**

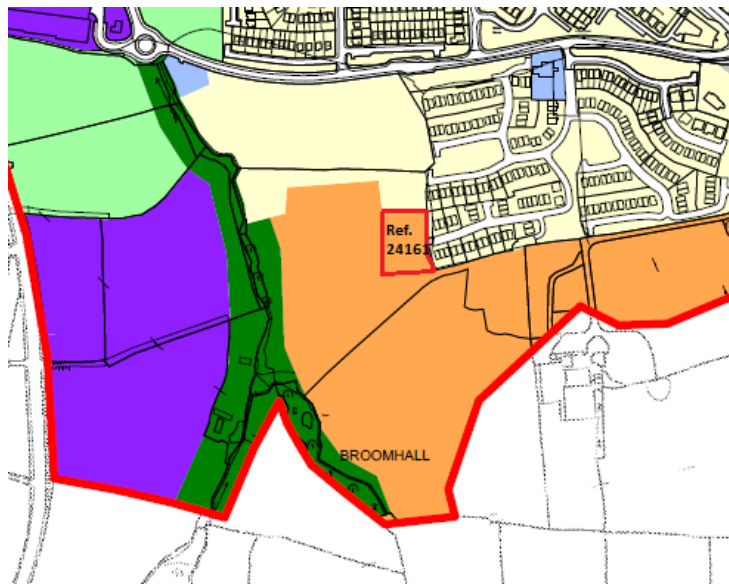
The lands at Site 1 were previously zoned Residential 2, with the number 2 referring to the density range applicable to the lands. The R2 lands were identified as '*medium density, up to 28 units per ha.*' In the Draft LAP the lands are proposed for a zoning change to *New Residential Priority 2*.

The proposed zoning change means the subject lands will only be considered for development where it can be shown that such development would accord with the Core Strategy targets after the activation of Priority 1 lands.

Lands immediately to the north of Site 1, are an active construction site where the current phase 1 (93 dwellings and a creche) are being constructed at Brookfield Park (Ref. 2237).

12 no. dwellings have been permitted by WCC on part of the land proposed to be zoned RN2 (Ref. 24161). This zoning should be changed to RN1 or RE to reflect the current permission.





**Figure 3 Extract from Proposed Zoning Map with Permitted Residential Development Outlined  
in Red on RN2 Lands**

Planning applications for development including 97 residential units (Ref. 24414) and a creche facility (Ref. 24422) have been recently submitted to Wicklow County Council. Both of these sites are now proposed for a zoning change to RN2 in the Draft WRLAP.



**Figure 4 Site Layout Plan from Planning Ref. 24414.**

**Source: Deane Turner Associates**

The layout plan shown above is from the current planning application (Ref. 24414), due for decision by WCC on the 11<sup>th</sup> December 2024. The above indicates that almost all of the lands within Broomhall ownership in Site 1 are being actively developed or currently going through the planning application process. It is Government policy to actively encourage development and use of urban zoned land and a taxation regime has been put in place to ensure that that is done.

Here we have a case of an active and reputable developer being put on the back burner when the track record is active and delivering not only housing but social infrastructure.

As noted above, the subject lands have been proposed for re-zoning to RN2 – New Residential Priority 2. The following relates to RN2 lands: -

In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this plan, this plan also provides for additional zoned serviced / serviceable residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will not be considered during the lifetime of this plan for RN2 lands unless the following conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.

Having reviewed the planning history on other lands zoned RN1, it is evident that there is a significant amount of RN1 lands with no planning history and/or no active development forthcoming. Broomhall Estates have been proactive in ensuring all of their landholding is serviced for delivering residential dwellings and if they are to be subject to the RN2 zoning, their lands become sterilised until developers with lands zoned RN1 are engaged in developing their landholdings.

This is a policy that has failed before in a previous raft of plans throughout the country. The development of lands zoned RN1 is entirely out of Broomhall Estates control and it is unfair to restrict landowners who are actively engaged in delivering residential developments in the Wicklow Rathnew area from developing their serviced and available residential landholdings.

Lands in the subject Broomhall area were identified for development as Action Area 9 as part of the Wicklow Environs Plan 2001. At that time landowners engaged with the Planning Authority on several occasions to agree the contents of the subsequent Action Area Plans, and on foot of that they formed a structured, sequential plan for developing out their landholding.

There is reasonable expectation that the active landowners who have progressively developed their landbanks should be allowed to continue with the housing developments, as allowed for in the AA9 in, which was finalised in 2007.

A number of significant infrastructure elements have been provided since the initiation of AA9, summarised as follows: -

- The Broomhall reservoir water supply tank is built and operating;
- Wicklow Town relief road and Port Access Road opened in 2005;

- Two business and enterprise parks were developed at Broomhall Business Park and Village Mill Enterprise Park (VMEP) located immediately to the west of the lands at Site;
- Planning permission has been granted in 2023 for significant expansion south of the VMEP;
- The Merrymeeting Neighbourhood centre constructed by Broomhall Estates Ltd accommodates Centra, Doctors surgery, Pharmacy, physiotherapy etc is located;
- Two 16 classroom schools were built by Broomhall Estates Ltd. One National and one Gaelscoil - Both schools are up and running since 2016 – 2017.

Therefore, the area is already provided with good physical and socio-economic infrastructure and is a prime location for continued and uninterrupted residential development planning.

It is clearly demonstrated through the landowner's long history of developments in the area and their current live planning applications that they are committed to the delivery of much needed housing on the subject lands and are actively developing their landholding.

The lands are fully serviced and available for immediate development and therefore should not be designated as RN2 zoning. It is requested that the zoning be changed to RN1.

The landowners are actively engaged in developing their landholding at Broomhall and employ c.100 workers, including apprentices. Construction of the permissions currently granted on the lands are underway and will be complete in c.6 months. If further development is restricted by being subject to the proposed RN2 zoning, the landowners will be forced leave the site on completion of the current phase and their employees will be made redundant.

Therefore, a strong case has been made to revert Site 1 from RN2 to RN1. The Rathnew core area should not be strangled awaiting completion of residential development south of the Wicklow town core.

### Site 2 and 3

As shown in the extract from the Wicklow-Rathnew LAP 2013-2019 zoning map below, Site 2 was included in the LAP boundary and designated as Enterprise and Employment lands and Site 3 was included within the Strategic Land Bank area.

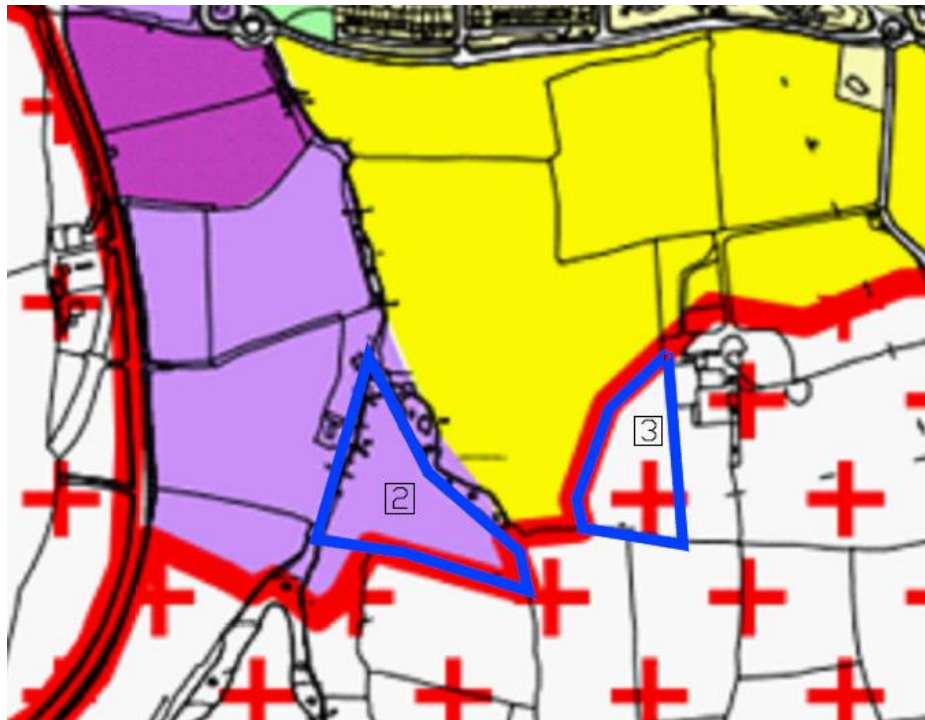


Figure 5 Extract from the WRLAP Zoning Map with Sites 2 and 3 Identified

<b>SLB</b>	<p><b>Strategic Land Bank:</b> To provide a land bank for future development of the settlement after the lifetime of this plan.</p>	<p>These are lands that are identified as being within the potential built envelope of the settlement with regard to proximity and accessibility to infrastructure.</p> <p>However, these lands are not suitable or necessary for development during the lifetime of this plan and may only be considered for detailed zoning and development after 2019.</p>
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Site 2 and 3 complete the landholding of Broomhall Estates in this area and it is their wish and intention to develop their entire landholding at Broomhall, Rathnew for residential development. Site 2 and 3 are logical areas for residential expansion that will not result in urban sprawl. Site 3 was not previously zoned due to sufficient water pressure not being available on the lands. This issue has been resolved by Broomhall Estates Ltd providing a water reservoir tank and the water supply from the Cronroe water supply system now has more than enough pressure to service above the 80m contour of the lands.

The area of Open Space designated between Site 1 and Site 2 will facilitate a natural amenity area for the existing and future residents of the Broomhall area by opening up the lands for development. No explanation for the removal of the Strategic Land Bank or the adjustment of the LAP boundary to exclude Site 2 from the Draft WRLAP has been provided within the Vision and Solution set out in the draft LAP, there is no longer term perspective.

The extract from the draft WRLAP zoning map in Figure 2 shows that Site 1,2 and 3 are located immediately adjacent to the significant employment area located at Ballinabarny alongside the M11 corridor. This area is identified in the WCDP as an area for strategic employment concentration at a County/sub-Regional level, with all primary access and service infrastructure already in place. Providing residential accommodation in close proximity to employment areas is best practice in terms of sustainable development, compact settlement and encouraging sustainable transportation/active travel.

It is requested that the LAP boundary be revised to include Site 2 and 3 for residential purposes, with a zoning objective of RN1, to be consistent with Site 1.

#### **Site 4**

Site 4 was zoned for Enterprise and Employment in the previous LAP and the draft WRLAP now proposes a zoning change to Community and Education. This site is located to the east of Rathnew Cemetery and is bound to the north by the R750 and the east by the Hawkstown Road.

The draft WRLAP provides the following list of uses as being generally appropriate for lands zoned Community and Education: - *burial grounds, places of worship, schools, training facilities, community hall, nursing homes, health related developments, sports and recreational facilities, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP and LAP.*

There is a significant amount of community and educational facilities in the immediate proximity of the subject site with a cemetery to the west, a creche, Broomhall Business Park, Gaelscoil Chill Mhantain and St Cohen's National School all within 350m of the site. The neighbourhood centre at Merrymeeting is also c.400m from the site.

It is submitted that neither the previous Enterprise and Employment or the draft proposed zoning of Community and Education are provided with justification to demonstrate that they are the appropriate use for the site. It is requested that the zoning be changed to Residential. The lands are accessible, well serviced in terms of surrounding social infrastructure and would be more suitable for residential development with all services including public transport within walking distance.

### **Site 5**

Site 5 was previously zoned for Tourism and Enterprise and Employment in the LAP 2013-2019. The draft WRLAP proposes a zoning of Employment for the entire site.

The draft WRLAP provides the following list of uses as being generally appropriate for lands zoned employment: - *general and light industry, office uses, enterprise units, education, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, including sports grounds, community facilities including community and sports centres, utility installations and ancillary developments for employment and industry uses in accordance with the CDP and LAP.*

While the importance of having sufficient land zoned for employment uses to sustain an urban area is acknowledged, there are lands zoned for employment on the western periphery, which are located just inside and are easily accessed from the M11. There is also a parcel of land, immediately inside the M11, which was identified as a Strategic Land Bank in the 2013-1029 LAP that has been removed from draft WRLAP. It is submitted that these alternative lands easily accessible from the M11 are more suitable locations for employment lands and it is requested that the zoning on the subject site be changed to Residential.

### **Submission**

There has been significant development along the Friars Hill Road, which is located to the north of Sites 1, 2 and 3 and there is reasonable expectation that the active landowners who have progressively developed their landbanks should be allowed to continue with the housing developments, as allowed for in the AA9 in 2007. These lands are immediately available for residential development.

In a Poly-centric context it is essential that a strong Core be identified in the southern Rathnew sector, where there is significant established and developing employment and a strong neighbourhood with developed infrastructure already in place.

The Compact Settlement Guidelines encourage co-location to achieve the 15-minute concept and accessing employment and services by sustainable means other than by private vehicle and exploiting infrastructure already in place. The re-zoning of Site 4 and 5 to residential is in accordance with the Compact Settlement Guidelines as both sites are within walking distance of the existing education, retail and social facilities (including the HSE Primary Care Centre) of Rathnew.

It is requested that this submission be taken into account in the preparation of the WRLAP.

Paula Shannon