



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Cyril McGuire of VC Land Investments Limited
Reference:	DWTRLAP-143107
Submission Made	November 18, 2024 2:34 PM

Topic

Land Use Zoning Map

Submission

Please refer to attached PDF.

Map



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Site Description:

Lands located south of the Village Mill Enterprise Park, off Friars Hill, Rathnew, Co. Wicklow.

File

Draft Wicklow Town - Rathnew LAP - Cyril McGuire Submission.pdf, 2.32MB

Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Monday, 18th November 2024

Dear Sir/Madam,

RE: DRAFT WICKLOW TOWN - RATHNEW LOCAL AREA PLAN 2025: SUBMISSION IN RESPECT OF LANDS AT FRIARS HILL, RATHNEW, CO. WICKLOW

1.0 INTRODUCTION

Cyril McGuire of VC Land Investments Limited¹ has retained Tom Phillips + Associates, Town Planning Consultants², to make this submission to the *Draft Wicklow Town - Rathnew Local Area Plan 2025*, which was published on 9th October 2024. This submission is made before the consultation period closes on 20th November 2024.

Our Client is the owner of a site which is located south of the Village Mill Enterprise Park, off Friars Hill, Rathnew, Co. Wicklow. The site is located in the south-west portion of Rathnew, at the edge of the village in an area which is currently evolving to provide new residential development.

This submission follows a submission made on behalf of our Client in respect of the *Wicklow Town – Rathnew Local Area Plan Pre-Draft Public Consultation Issues Papers* which were published on 19th July 2023.

The purpose of this submission is to request Wicklow County Council reverse the proposed rezoning of the subject site from 'E2 – Enterprise and Employment (warehousing)' to 'AOS – Active Open Space'. Our Client does not dispute the proposed rezoning of the small eastern portion of the subject site from 'E2 – Enterprise and Employment' to 'OS1 – Open Space' and acknowledges the need to protect the mature trees and hedgerows at this location.

¹ Seascope, 2 St. Albans, Newtownsmith, Sandycove, Co. Dublin, A96 YF10.

² 80 Harcourt Street, Dublin 2, D02 F449.

1.1 Executive Summary

Our Client has a long established and successful track record of providing high quality developments and intends to deliver the same at the subject site, subject to the requisite land use zoning.

While it would be most preferable to our Client for the subject site to be rezoned to allow for residential development, should this not be considered appropriate by Wicklow County Council, we would ask that the zoning of the site remain Enterprise and Employment, so as to allow our Client to develop these lands in the future. We highlight that the subject site is bound to the north and south by lands zoned for Enterprise and Employment use. We understand that a portion of the lands located immediately south of the subject site are in the joint ownership of Wicklow Enterprise Board and Wicklow County Council, who intend to develop this site for enterprise and employment use. The development of the subject site for enterprise and employment use would allow for increased synergies between the subject site, the existing business park to the north, and zoned land to the south.

Our Client, Cyril McGuire, has a proven history of successfully delivering large-scale commercial developments, most recently the Mastercard Campus at South County Business Park, Leopardstown, Co. Dublin (see enclosed images).

We highlight that our Client does not dispute the proposed rezoning of the small eastern portion of the subject site from 'E2 – Enterprise and Employment' to 'OS1 – Open Space' and acknowledges the need to protect the mature trees and hedgerows at this location.

We contend that the proposed rezoning of the subject site to 'AOS – Active Open Space' is inappropriate and not required, given the existing and planned future provision of Active Open Space in the immediate vicinity of the subject site, as well as the wider Wicklow Town and Rathnew area.

The calculations provided in the *Draft Wicklow Town – Rathnew Local Area Plan 2025* (referred to as the Draft LAP herein) and its associated 'Social Infrastructure Audit' for the existing and required quantum of Active Open Space is, in our opinion, flawed. The calculation does not accurately reflect the existing provision of Active Open Space, nor does it acknowledge new Active Open Space which is in construction. We specifically draw attention to the fact that the large landholding at the Wicklow Golf Club was not included in the calculation of existing Active Open Space as it is "for fee paying members only". This is incorrect, as the Wicklow Golf Club is not a members only facility and regardless of this, the vast majority of sporting clubs and organisations operate on a fee paying basis.

We further highlight the discrepancy behind the inclusion of the population of the LAP catchment area when calculating the quantum of Active Open Space Required, but not included the existing and planned Active Open Space within the catchment area when calculating the existing provision of Active Open Space.

Whilst the importance of Active Open Space is acknowledged, we contend that a sufficient quantum of land is available for this use, without the need for the subject site to be rezoned for this purpose. We highlight that neither the Draft LAP nor the associated 'Social Infrastructure Audit' outlines the rationale behind the rezoning of the subject site, other than that additional land was required for Active Open Space Use. The subject site is located in an area which is arguably already one of the best served within the LAP with regard to Active Open Space, with a plethora of pitches and a playground located within close walking distance.

We request that Wicklow County Council reconsider the proposed rezoning of the subject site, to allow for the future provision of residential or enterprise/employment development.

2.0 DEVELOPMENT POTENTIAL OF THE SUBJECT SITE

Whilst we acknowledge that the subject lands are currently undeveloped, we highlight that our Client only purchased the site in April 2016 and has since engaged with the requisite professionals to begin the process of developing these lands.

The subject site is inherently suitable for development, due to its location in proximity of existing and planned employment and residential developments, proximity to the M11, and extensive zoning history for built development. The initial purchase of the subject site was contingent on the provision of employment uses, however this was not considered viable at the time of the Issues Papers Consultation period for the subject LAP, whereby a rezoning for residential use was proposed. The argument for the development potential for the subject site for residential use is outlined in the submission by our Client to the Pre-Draft Issues Paper Stage of the *Draft Wicklow Town – Rathnew Local Area Plan* (Submission No. 75). This previous submission shows the clear intention of our Client to develop these lands in the near future.

It was never envisaged that the subject lands would be rezoned for 'Active Open Space'.

Our Client, Cyril McGuire, has a proven track record in the delivery of high quality schemes throughout the Greater Dublin Area, most recently delivering the Mastercard Innovation Campus at South County Business Park, Leopardstown, Co. Dublin. The campus serves as the European Technology Hub for Mastercard, with over 2,000 employees currently based at this development. The campus has been designed with specific regard to sustainability, biophilic design, wellness, and neurodiversity. The campus has been awarded LEED Gold certification, WELL and WiredScore Platinum as well as receiving a 'Building Award' by the Sandyford Business District.



Figure 2.1: Mastercard Innovation Campus, South County Business Park, Leopardstown, Co. Dublin.
(Source: Mastercard.)



Figure 2.2: Mastercard Innovation Campus, South County Business Park, Leopardstown, Co. Dublin.
(Source: Mastercard.)



**Figure 2.3: Mastercard Innovation Campus, South County Business Park, Leopardstown, Co. Dublin.
(Source: Cyril McGuire.)**



**Figure 2.4: Mastercard Innovation Campus, South County Business Park, Leopardstown, Co. Dublin.
(Source: Cyril McGuire.)**



Figure 2.5: Mastercard Innovation Campus, South County Business Park, Leopardstown, Co. Dublin. (Source: Mastercard.)



Figure 2.6: Aerial view of the Mastercard Innovation Campus, South County Business Park, Leopardstown, Co. Dublin, showing Phase 1 of construction completed and Phase 2 under construction. (Source: Google Earth.)

A review was undertaken of all submissions lodged at the Pre-Draft Issues Paper Stage of the LAP and we highlight that no submissions specifically identified the subject site as being suitable for Active Open Space.

The subject site is bound immediately to the north by an existing enterprise development, The Village Mill Enterprise Park. The lands located immediately south of the subject site are similarly zoned for Enterprise and Employment. We further highlight that a new business park development has recently been granted permission, located in close proximity to the south of the subject site (Wicklow Reg. Ref. 221269). We understand that a portion of the lands located immediately south of the subject site are in the joint ownership of Wicklow Enterprise Board and Wicklow County Council, who intend to develop this site for enterprise and employment use. The development of the subject site for enterprise and employment use would allow for increased synergies between the subject site, the existing business park to the north, and zoned land to the south.

Whilst the rezoning of the subject site to allow for residential development would be optimal in the view of our Client, the retention of the current 'E2 – Enterprise and Employment (Warehousing)' land use zoning would also be welcomed, to ensure the future development potential of this site, which is wholly in keeping with the wider pattern of land use zoning in the surrounding area.

3.0 SITE CONTEXT

3.1 Subject Site and Urban Context

The subject site measures c. 4.1 Ha and is located in the Broomhall area of Rathnew, Co. Wicklow. The site is currently used for agricultural purposes. The site is bound to the north by the Village Mill Enterprise Park, to the south by agricultural lands, to the west by the R772 and agricultural land, and to the east by a residential development which is currently under construction.

The surrounding character to the south and west of the subject site is primarily agricultural, though we highlight that the lands to the south are zoned for Enterprise and Employment development. The surrounding character to the north and east of the subject site is primarily residential. The Broomhall area is currently undergoing a period of significant change, with a number of new residential developments being constructed, particularly those sites located south of Friars Hill. The subject site forms the end of a clear pattern of residential development within this area.

This part of Rathnew is characterised by a wide range of services and amenities that reflect the rapidly emerging residential nature of the area. This includes St. Coen's National School, Gaelscoil Chill Mhantáin, and Coláiste Chill Mhantáin, which are the primary and secondary schools serving the local community. The Merrymeeting Shopping Centre provides for the retail and healthcare needs of the local community, including a convenience store, post office, pharmacy, and GP clinic. Rathnew GAA club is located centrally within this residential area, which features a number of playing pitches and training areas. Rathnew AFC also operate from this location.

The Broomhall area is well connected to both Rathnew and Wicklow Town and has easy access to the M11 via exit 17. The M11 provides links northbound to Dublin and southbound to Wexford.



Figure 2.1: Location of our Client's lands outlined in red. (Source: Google Maps, as annotated by Tom Phillips + Associates, 2024.)



Figure 2.2: Location of our Client's lands (indicated by yellow star) in the context of the Local Area Plan boundary. (Source: MyPlan.ie, as annotated by Tom Phillips + Associates, 2024.)

3.2 Planning History

There have been 2 no. previous planning applications lodged for the subject lands, in the ownership of our Client. Application Reg. Ref. 072333 was lodged on 2nd November 2007 and sought the provision of an innovation, business, and enterprise park, comprised of warehousing, offices, retail, and creche uses. The development would provide 24,062 sqm gross floor area, with buildings ranging in height from 2 to 4 storeys. This application was granted permission by Wicklow County Council on 25th September 2008, and subsequently granted permission by An Bord Pleanála on 18th September 2009 on appeal (ABP. Ref. 27.231441).

An extension of duration (Reg. Ref. 41801) was lodged for application Reg. Ref. 072333 on 5th September 2014, citing that the application could not be implemented previously due to economic and commercial reasons. A 5 year extension of duration was granted on 16th October 2014, which brought the appropriate period to 16th December 2019. This extension of duration was never implemented and the appropriate period has now lapsed.

This planning history confirms that the site was considered appropriate for largescale commercial development in the recent past, in line with its zoning Objective.

4.0 WICKLOW TOWN AND RATHNEW DEVELOPMENT PLAN 2013-2019

This Section will review the *Wicklow Town – Rathnew Development Plan 2013-2019* (referred to as the 2013 Plan herein), which has expired, but is the extant plan for the area until the adoption of the forthcoming *Wicklow Town – Rathnew Local Area Plan 2025*.

Our Client’s lands were zoned ‘E2 – Enterprise and Employment (Warehousing)’ within the 2013 Plan. This Land Use Zoning has the following Objective:

“To provide for enterprise and employment development in the form of light industry, warehousing and logistics development.”

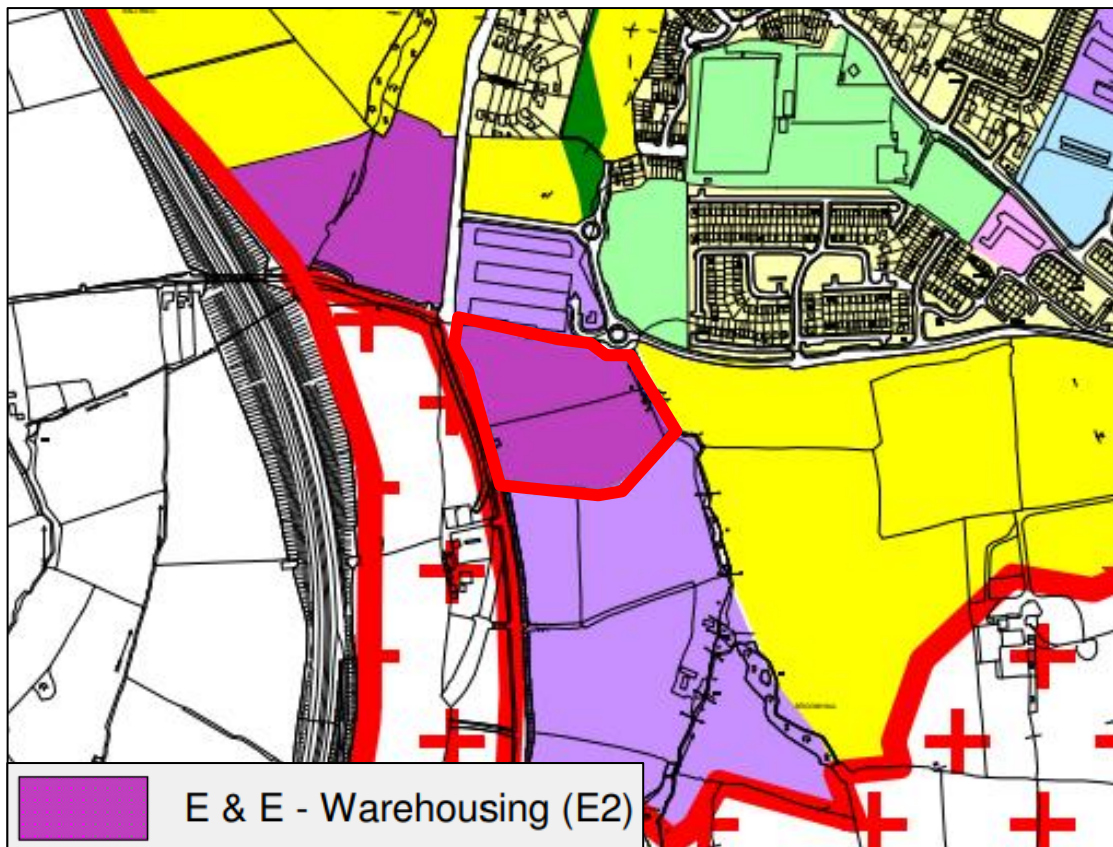


Figure 4.1: Land Use Zoning for the subject site (outlined in red) as part of the *Wicklow Town – Rathnew Development Plan 2013-2019*. (Source: Wicklow County Council, annotated by Tom Phillips + Associates, 2024.)

The uses ‘Typically Permitted’ for lands zoned ‘E2’ are as follows: Car Park, Crèche, Education, Enterprise Centre, Industry (General), Industry (Light), Office-Based Employment, Petrol Station, Port related uses, Public Services, Recycling Centre, Restaurant³, Service Garage, Warehouse, and Waste Transfer Station.

5.0 DRAFT WICKLOW TOWN - RATHNEW LOCAL AREA PLAN 2025

5.1 Land Use Zoning

The *Draft Wicklow Town - Rathnew Local Area Plan 2025* (referred to as the Draft LAP herein) was published on 9th October 2024.

As part of this Draft LAP, our Client’s lands are shown to be rezoned from ‘E2 – Enterprise and Employment (Warehousing)’ to ‘AOS – Active Open Space’ and ‘OS1 – Open Space’.

³ Restaurant – This refers strictly only to small restaurant servicing only the needs of those employed in the zone.

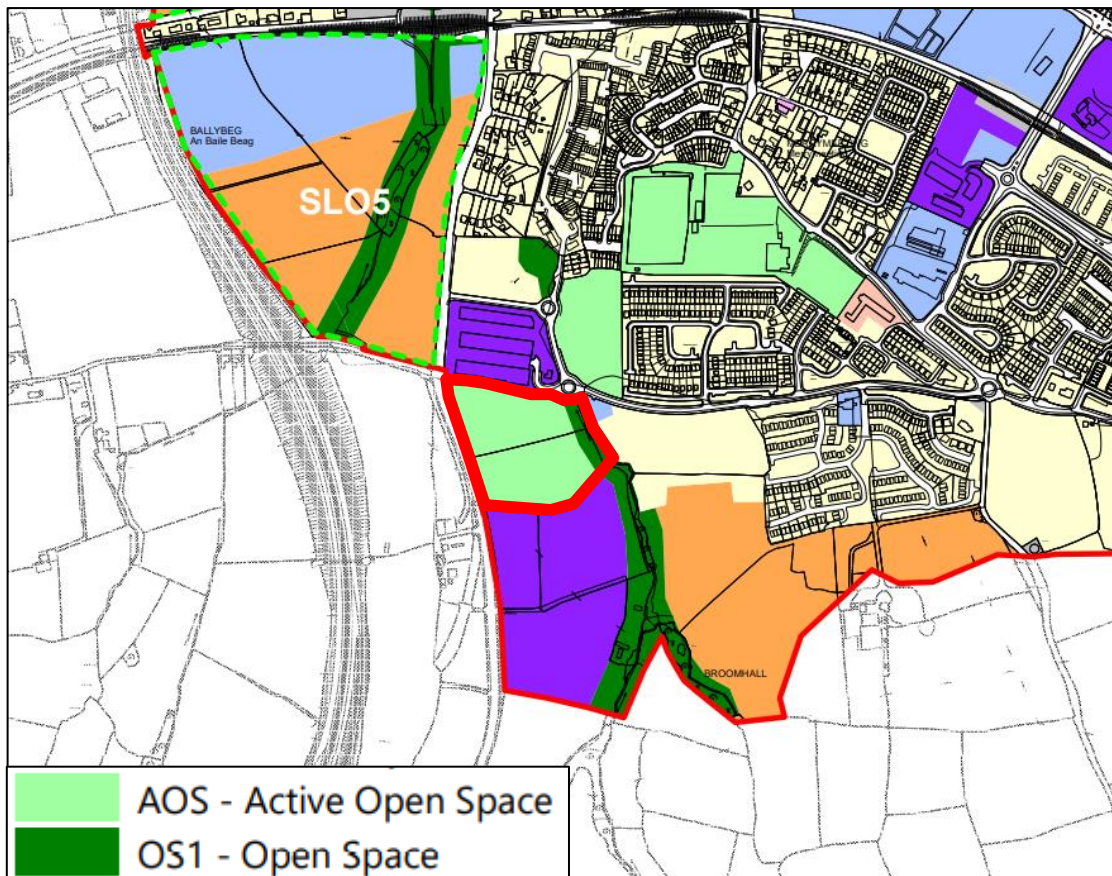


Figure 5.1: Extract from the Land Use Zoning Map as contained within the *Draft Wicklow Town - Rathnew Local Area Plan 2025*, which shows the proposed rezoning of the subject site (indicated by red-line boundary). (Source: Wicklow County Council, as annotated by Tom Phillips + Associates, 2024.)

The 'OS1 – Open Space' Land Use Zoning has the following Objective within the Draft LAP:

“To protect and enhance existing and provide for recreational open space.”

This Land Use Zoning is described as follows in the Draft LAP:

“Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.”

The 'AOS – Active Open Space' Land Use Zoning has the following Objective within the Draft LAP:

“To protect and enhance existing and provide for new active open space.”

This Land Use Zoning is described as follows:

“Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas.”

The purpose of this submission seeks to oppose the zoning of the majority of the subject site from ‘E2 – Enterprise and Employment (Warehousing)’ to ‘AOS – Active Open Space’. Our Client does not oppose the rezoning of a small area within the eastern portion of the subject site from ‘E2 – Enterprise and Employment (Warehousing)’ to ‘OS1 – Open Space’.

5.2 Active Open Space

The Draft LAP sets out that a minimum standard of 2.4Ha of Active Open Space⁴ is required per 1,000 population, this is in accordance with the Council’s own ‘Play’ and ‘Sports & Recreation’ strategies. These strategies are based upon the *Six Acre Standard 2001*.

The Draft LAP includes a ‘Social Infrastructure Audit’, which outlines in greater detail how this calculation has been determined. Table 2.17 (shown in Figure 5.2 below), as extracted from the Social Infrastructure Audit, lists the Active Open Space identified by Wicklow County Council, with their respective approximate areas. These areas have been totalled to determine what Wicklow County Council considers to be the existing Active Open Space provision within the LAP.

⁴ This reference to ‘Active Open Space’ relates to the use for land for this purpose and not necessarily the zoning as such.

Map Ref	Name	Open Space Type	Approximate Area (ha)
1	St Patricks GAA Club Wicklow Town	Outdoor Play Space	3.99
2	St Patricks GAA Club Wicklow Town second pitch (under construction)	Outdoor Play Space	4.5
3	Wicklow Rovers AFC	Outdoor Play Space	1.7
4	Wicklow Rovers AFC pitch 2 (Rocky Road)	Outdoor Play Space	1.1
5	Wicklow Town AFC	Outdoor Play Space	1.9
6	Rathnew AFC	Outdoor Play Space	3.5
7	Rathnew GAA Club	Outdoor Play Space	4.5
8	Wicklow Rugby Club	Outdoor Play Space	5.3
9	Wicklow Tennis Club	Outdoor Play Space	0.25
10	Pitches at Dominican Convent	Outdoor Play Space	2.4
11	Pitches at Colaiste Chill Mhantáin	Outdoor Play Space	1.25
12	Pitches at East Glendalough School	Outdoor Play Space	0.6
13	Wicklow Golf Club (Members only club, therefore area not included)	Outdoor Play Space	38.5
		TOTAL	30.9 (excluding golf club)
14	Abbey grounds	Casual Play Space	1.2
15	Black Castle	Casual Play Space	2.2
16	Leitrim River riverwalks	Casual Play Space	1
17	Murrough casual spaces	Casual Play Space	3.2
18	Marlton Riverine Park	Casual Play Space	5
19	Wicklow Town Beaches		
20	Rathnew Village Square (Clermont Grove)		1
		TOTAL	12.6
21	Ballynerrin Playground	Equipped Play Space	0.9
22	Rathnew Playground	Equipped Play Space	0.4
23	Murrough Playground	Equipped Play Space	0.1
24	Murrough Skate Park & Outdoor Gym	Equipped Play Space	0.5
25	The Murrough dog Park	Equipped Play Space	0.2
26	Ball Alley	Equipped Play Space	0.023
		TOTAL	2.2
	Total		44 hectares

Figure 5.2: Extract from Table 2.17 of the ‘Social Infrastructure Audit’ prepared as part of the *Draft Wicklow Town – Rathnew Local Area Plan 2025*, showing the Active Open Space identified by Wicklow County Council within the LAP boundary.

It is important to note that the Wicklow Golf Club, despite being identified as part of the Social Infrastructure Audit, is not included in the calculation of Active Open Space. This is detailed further in Section 5.2.1 below. We further highlight that despite the Wicklow Town Beaches being identified in Table 2.17, no area is assigned to them, therefore they do not form part of the calculation for the existing Active Open Space Provision.

The geographical spread of these Active Open Spaces is shown in Figure 5.3 below.

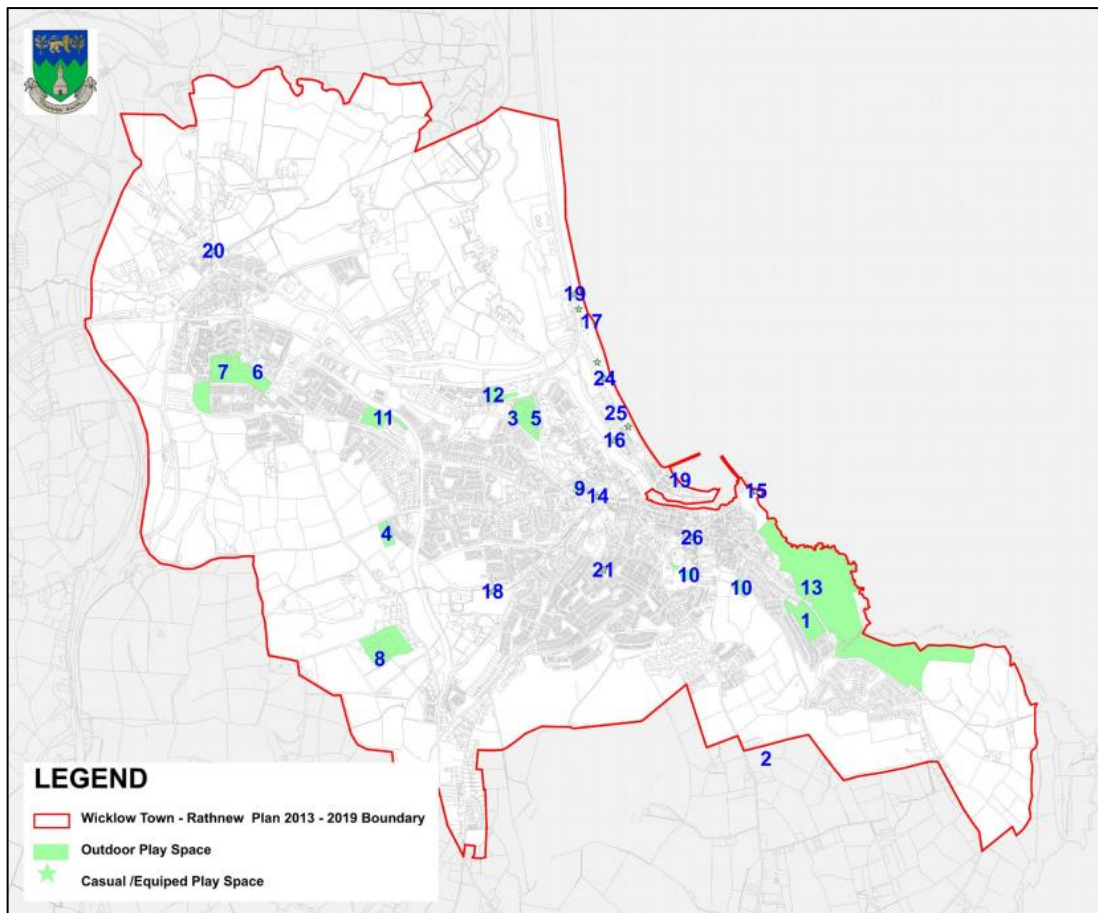


Figure 5.3: Extract from Map 12 included as part of the Social Infrastructure Audit prepared as part of the *Draft Wicklow Town – Rathnew Local Area Plan 2025*, which shows the geographical spread of the identified existing Active Open Space within the LAP Boundary.

Following on from this analysis of the existing Active Open Space, the Social Infrastructure Audit outlines the calculation for the total Active Open Space requirement:

*“However, the sports and recreational facilities in the settlement cater for the population within the settlement as well as the population of the surrounding rural areas. The facilities provide sports and recreation for a large catchment. The 2022 population of the settlement and its catchment was 24,886⁵, including the settlements targeted growth up to 2019, **the 2031 population of the settlement and catchment is c.27,900 persons**, the following areas of active open space are required at a minimum:*

- **66.8ha overall**
- 44.6ha outdoor play space
- 16.7ha casual play spaces
- 5.5ha equipped play space.” [Our Emphasis.]

⁵ This includes the Electoral Divisions of Wicklow Urban, Wicklow Rural, Glenealy, Dunganstown, Ballycullen, Moneystown, Killiskey.

*“With respect to organised sports grounds, outdoor / casual play spaces and equipped play spaces, there is **currently a total of c.45ha** in open space use in the settlement⁶. Therefore at a minimum there appears to be a **need to zone a total of c.66.8ha** of open space in the settlement to cater for the settlement and its catchment. In addition to existing facilities, **the following undeveloped open space zonings provide for additional open space to meet the needs of the future population.**” [Our Emphasis.]*

On the basis of the calculation provided above, it was determined that additional land was required to be zoned for Active Open Space Use, including the subject site which is identified as ‘Ballynabarney, Rathnew’ in the table below:

Zoned Undeveloped Land		
Location	Zoning	Area (ha)
Hawkstown Road / Ashtown Lane	Active Open Space	4.7
Rocky Road	Active Open Space	5.6
Brides Head	Active Open Space	4
Wicklow Rugby Club	Active Open Space	7
Tinakilly	Active Open Space	2.45
Ballynabarney, Rathnew	Active Open Space	3.7
Bollarney	Open Space	3
	Total new open space lands	30.6 hectares
	Total existing open space lands	45 hectares
	Overall Total	75.6 hectares

Figure 5.4: Extract from Table 2.18 of the Social Infrastructure Audit prepared as part of the *Draft Wicklow Town – Rathnew Local Area Plan 2025*.

We contend that the calculation used for assessing the quantum of open space in the LAP area is crude and does not accurately reflect the existing and planned provision of open space. An analysis of the inconsistencies in this method of calculation are set out in Section 5.2.1 below.

The LAP states that a minimum of 66.8Ha of open space is required to meet the current and future anticipated needs of the population. The existing provision and ‘Zoned Undeveloped Land’ result in a total of 75.6Ha of Active Open Space, which is 8.8Ha greater than that required. We contend that the inclusion of the subject site is unnecessary, as the minimum quantum of open space land would still be c. 5Ha in excess of the minimum requirements if the site was not zoned ‘Active Open Space’.

In spite of this, we contend that the actual existing quantum of Active Open Space is significantly in excess of the 66.8Ha required, which will be detailed further in the Sections below.

⁶ “These figures do not include Wicklow Golf Club, it is an important sports grounds for Wicklow, however the golf club is for fee paying members only.”

5.2.1 Issues with Calculation of Required Active Open Space

Catchment Area

The ‘Social Infrastructure Audit’ states that the calculations are based on the future population projections of the LAP and its catchment area. This catchment area includes the following Electoral Divisions: Wicklow Urban, Wicklow Rural, Glenealy, Dunganstown, Ballycullen, Moneystown, and Killiskey (the latter five listed are primarily located outside of the LAP area). Whilst the population of the LAP is anticipated to be c. 19,400 persons in 2031, for the purpose of this calculation, the Local Authority has utilised the population of both the LAP and its catchment area, which has a combined total anticipated population of c. 27,900 persons.

While the populations of these Electoral Divisions outside of the LAP have been included in the catchment area, the active open space facilities located within these same Electoral Divisions have not been included.

We draw particular attention to the permission granted for a large GAA Club development at a site measuring c. 8.78Ha at Glenealy (WCC Reg. Ref. 17/706, ABP Ref. PL27.300693), for the provision of 2 no. full size GAA pitches, 2 no. juvenile pitches, handball alley, running track, outdoor gym, all-weather training pitch, hurling wall, and clubhouse with changing rooms. Construction appears to be ongoing at this site.

We further draw attention to the Oak Hill Cricket Club, Barndarrig GAA Club, Gormanstown Driving Range, Davils Glen Equestrian Centre, Blainroe Golf Club, Polo Wicklow, Ashford Rovers AFC, and Ashford GAA Club, the facilities of which are all located within the ‘catchment area’ but have not been accounted for in the calculation of existing facilities. It would appear counterintuitive to include these populations in the calculation for the need for open space, but to not have regard to the existing facilities in these areas.

We contend that it is incorrect and misleading to calculate the required quantum of Active Open Space based on the population of the LAP as well as its catchment area, without acknowledging the existing and planned Active Open Space within the catchment area, which not only serve their immediate communities, but conversely will also serve the population of the LAP.

Omission of Wicklow Golf Club Grounds

The ‘Social Infrastructure Audit’ prepared as part of the Draft LAP states that despite the large area of ‘Active Open Space’ zoned land at the Wicklow Golf Club, this land has not been included as part of the calculation of existing open space use, as it is “*for fee paying members only*”. This statement is incorrect. The Wicklow Golf Club website states the following:

“Visitors can enjoy a casual round of golf everyday outside competition times as well as open competitions weekly”.

While there is an option to buy an annual membership to the golf club, it is also possible to 'pay as you go'. We highlight that a large number of the 'Outdoor Play Spaces', as listed in the Social Infrastructure Audit, are sports clubs which require annual dues for membership and use of facilities. A number of these other facilities are not openly available for the public to use as and when they wish, with schedules in place for fixtures and booking systems for members outside of these times.

In spite of this, we highlight that neither the *County Wicklow Sports and Recreation Policy* or *Wicklow County Council Play Policy*, the Policy documents which underpin the '2.4Ha per 1,000 population' calculation, state that sports and leisure facilities which have membership structures should not be considered as contributing to the overall offering in an area.

We therefore contend that the complete omission of the Wicklow Golf Club lands in the calculation of existing Active Open Space is incorrect and skews the quantum of actual available Active Open Space within the LAP boundary.

The inclusion of these lands would increase the recognised quantum of Active Open Space within the LAP boundary from 45.7Ha to 84.2Ha, well in excess of the identified minimum quantum required (66.8Ha).

We further highlight that despite the Wicklow Town Beaches being identified as being Active Open Spaces, they have also been excluded from the calculation. We also highlight that the lands at Marlton Equestrian Centre have also not been included as part of the calculation for 'Active Open Space', despite being a purpose built outdoor facility for sports and leisure use.

Other Active Open Spaces not Included in Calculation

The Draft LAP states the following in relation to Active Open Space within housing developments:

"Numerous casual informal play spaces also exist around the town, in the form of open parks and the open spaces associated with housing developments, and new housing developments will be required to provide a minimum of 15% of the site area for such use (these open spaces are generally zoned RE or OS1). The plan includes land zoned 'OS2' which is intended to be maintained in its current undeveloped natural state in the interest of visual and natural amenity."

Despite this acknowledgement of the role Active Open play within residential areas, this has not been reflected in the calculation for required Active Open Space.

There have been a range of Planning Applications within the local area which have included the provision of active open space, a number of which are under construction.

We highlight the lands immediately east of the subject site, at Brookfield Park, which seek to provide a large quantum of public open space. The first phase of development, which is nearing completion, includes a ball park and children’s play area (Application Reg. Ref. 2237, as amended). Further east along Broomhall Court Road, another project mid-construction (Application Reg. Refs. 211119 and 211187) includes the provision of space for informal play, play facilities, exercise stations, and kick about area.

The ‘zoned undeveloped land’ at Tinakilly is listed in the Social Infrastructure Audit as measuring 2.45Ha, which equates to the area of land zoned at this location for ‘Active Open Space’, however this is not reflective of the development at this location which is nearing completion. It is evident when comparing the plans for this development, aerial photography, and the draft land use zoning map, that the area of ‘Active Open Space’ extends outside of the area zoned as such. The landscaping plan for this development, as is currently being constructed was granted under Wicklow County Council Application Reg. Ref. 22837, which included 8.8Ha of Active Open Space and 0.7Ha of Passive Open Space. The permitted active open space includes an adventure play zone, fitness zone, and level area for the potential future provision of a full size GAA pitch. We highlight that Tinakilly Park is located c. 1.4km (20 minute walk) from the subject site.

We further highlight that a large area of land previously zoned ‘Active Open Space’ located immediately east of this site has been rezoned to ‘Open Space’ as part of the Draft LAP, which is not reflected in the calculation of Active Open Space.

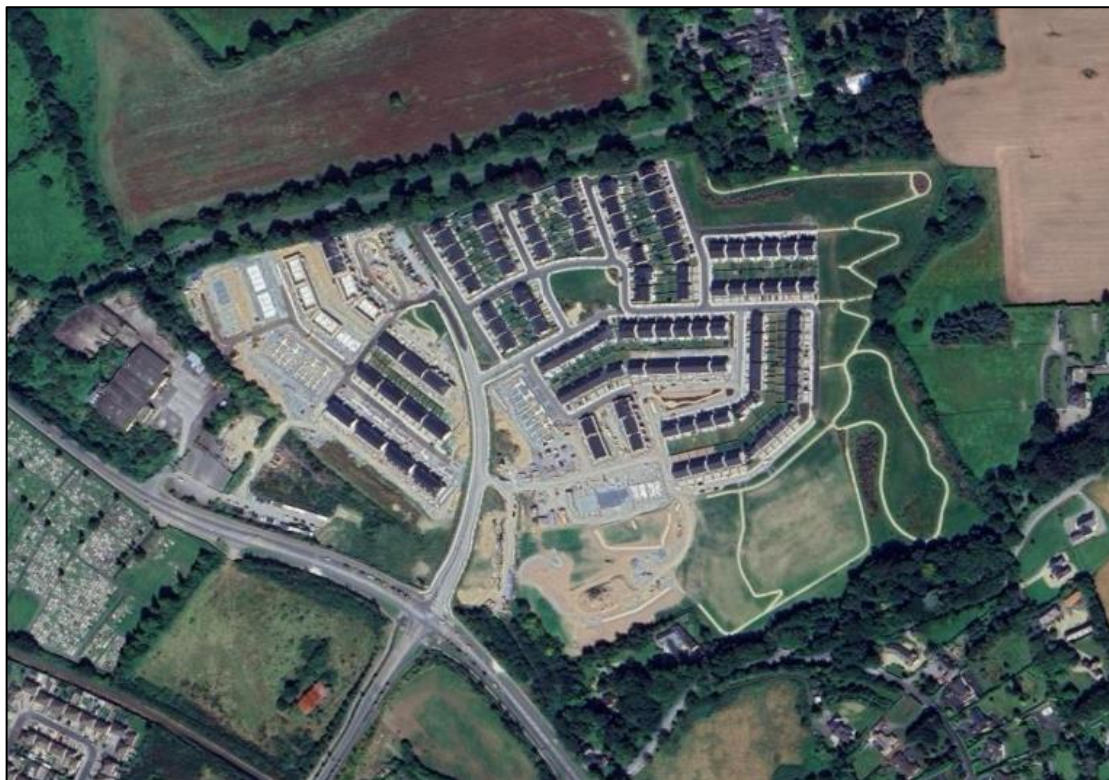


Figure 5.5: Aerial view of the Tinakilly Park development, which shows the large area of Active Open Space in situ, which is not fully captured in the calculation. (Source: Google Earth, captured 12/08/24.)

The calculation of Active Open Space has also not had regard to the future provision of Active Open Space which will be provided as part of a new educational facility within the SLO 5 area, as defined in the LAP. This SLO area is located immediately north-west of the subject site. We highlight that the ‘CE – Community and Education’ zoned land is specifically reserved for future educational use, for which sufficient Active Open Space must be provided. A concept plan for this SLO is shown in Figure 5.6 below, as extracted from the LAP, which shows a range of Active Open Spaces, included pitches, courts, and a park.

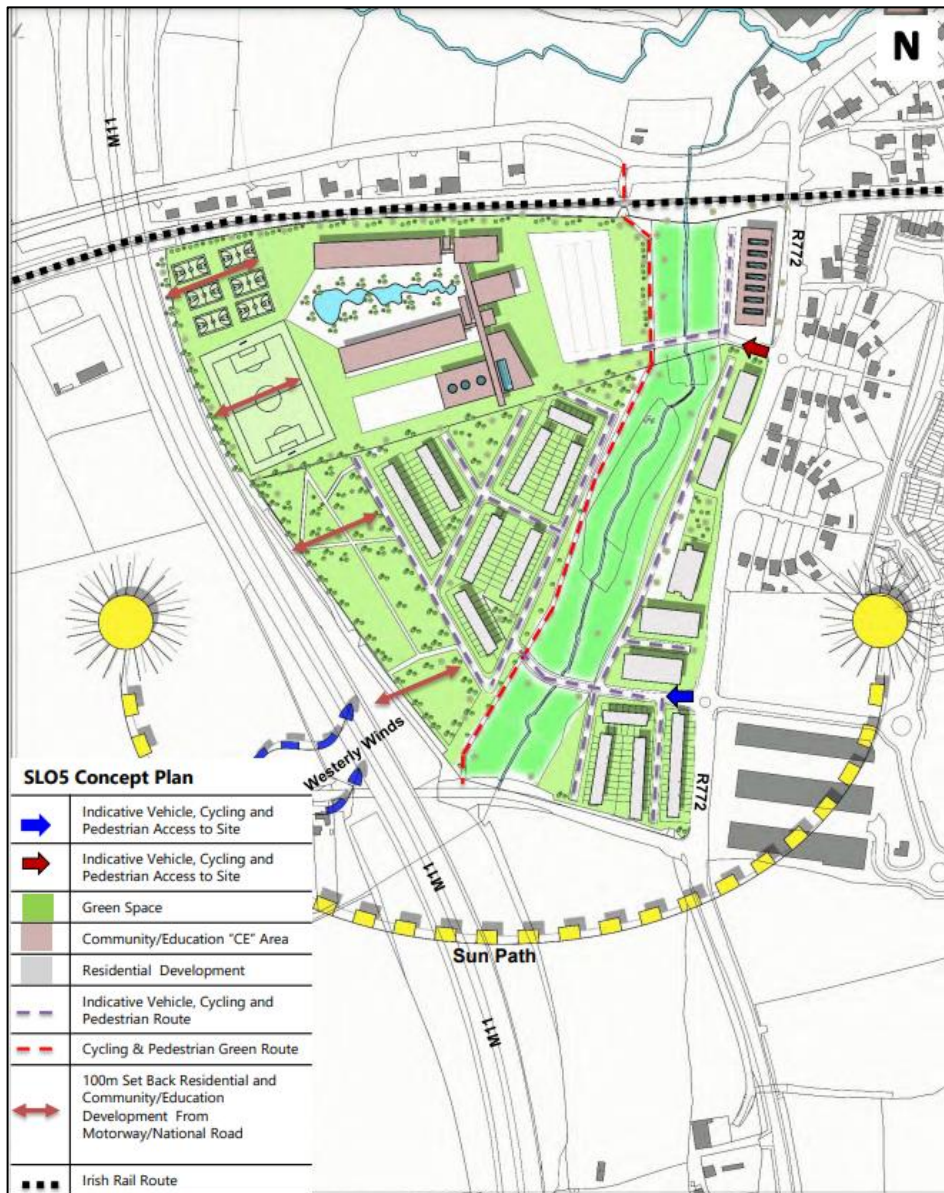


Figure 5.6: Extract from the Draft LAP, showing the Concept Plan for SLO 5, which includes a large quantum of Active Open Space. The subject site is visible to the south-east of SLO 5. (Source: Draft Wicklow Town -Rathnew Local Area Plan 2025.)

There is a large quantum of existing and planned Active Open Space located in close proximity to the subject site which has not been captured in the calculation of Active Open Space in the LAP.

5.2.2 Distribution of Active Open Space within the LAP

We contend that the area surrounding the subject site is already well served by open space, with the pitches and training facilities for Rathnew GAA Club and Rathnew AFC both located in close proximity. The pitch at Coláiste Chill Mhantáin and Rathnew Playground are also located within walking distance. Whilst we acknowledge that the area surrounding the subject site is evolving in land use terms, with a number of residential developments under construction, we contend that this area is one the best served in the LAP with regard to open space, and these new residential developments all include a range of formal and informal open space provision. The southern portion of Rathnew is not considered to be ‘deficient’ with regard to sports clubs. We highlight that there are no sports clubs or areas zoned ‘Active Open Space’ located within the northern portion of Rathnew.

The Social Infrastructure Audit notes the importance of ensuring a suitable spatial distribution of Active Open Spaces:

*“In addition to considering the quantum of open space that is required, there is a need to ensure a **suitable spatial distribution of spaces**, so that all developed areas, particularly residential areas (existing and planned) can access amenity and sports grounds by active and sustainable means (walking / cycling / public transport). Having considered the catchment of existing sports clubs, **there are clearly existing areas where there are deficiencies.**” [Our Emphasis.]*

An analysis has been undertaken using the publicly accessible ArcGIS Polygon Layer for the *Wicklow Town - Rathnew Local Area Plan 2025*, which has shown the approximate area of lands zoned AOS within the Draft LAP to be 49.39Ha. These lands are not evenly spread throughout the LAP, with a distinct lack of Active Open Space zoned land within the northern part of Rathnew. The geographical distribution of lands zoned ‘AOS - Active Open Space’ is shown in Figure 5.7 below.

No.	Site Location	Zoned AOS in Previous LAP?	Site Area (Ha)
1	Lands off R702 (SE corner of LAP)	Yes	4.02
2	Wicklow Rovers AFC Hockey Pitch	No	0.78
3	Ballynerrin Playground	Yes	0.90
4	St. Patricks GAA	Yes	3.37
5	Wicklow Tennis Club	No	0.39
6	Wicklow Rovers AFC - Rocky Road	No	5.62
7	Coral Leisure / Wicklow Town AFC	No	3.39
8	Ballynabarney, Rathnew (Subject Site)	No	3.72
9	Rathnew GAA/AFC	Yes	1.91
10	Handball Alley	Yes	0.02
11	Rugby Club and adjoining lands	Partly	9.20
12	Lands adjoining Rugby Club	Yes	3.16
13	Rathnew GAA/AFC	Yes	5.71
14	Lands between Hawkstown Road and Ashtown Lane	Yes	4.74
15	Part of new development at Tinakilly	Yes	2.46
Total AOS Zoned Land (Excl. Golf Club)			49.39
16	Wicklow Golf Club (Part)	Yes	23.36
17	Wicklow Golf Club (Part)	Yes	13.00
Total AOS Zoned Land (Incl. Golf Club)			85.75

Table 5.1: Lands zoned 'AOS – Active Open Space' within the *Draft Wicklow Town – Rathnew Local Area Plan 2025*.

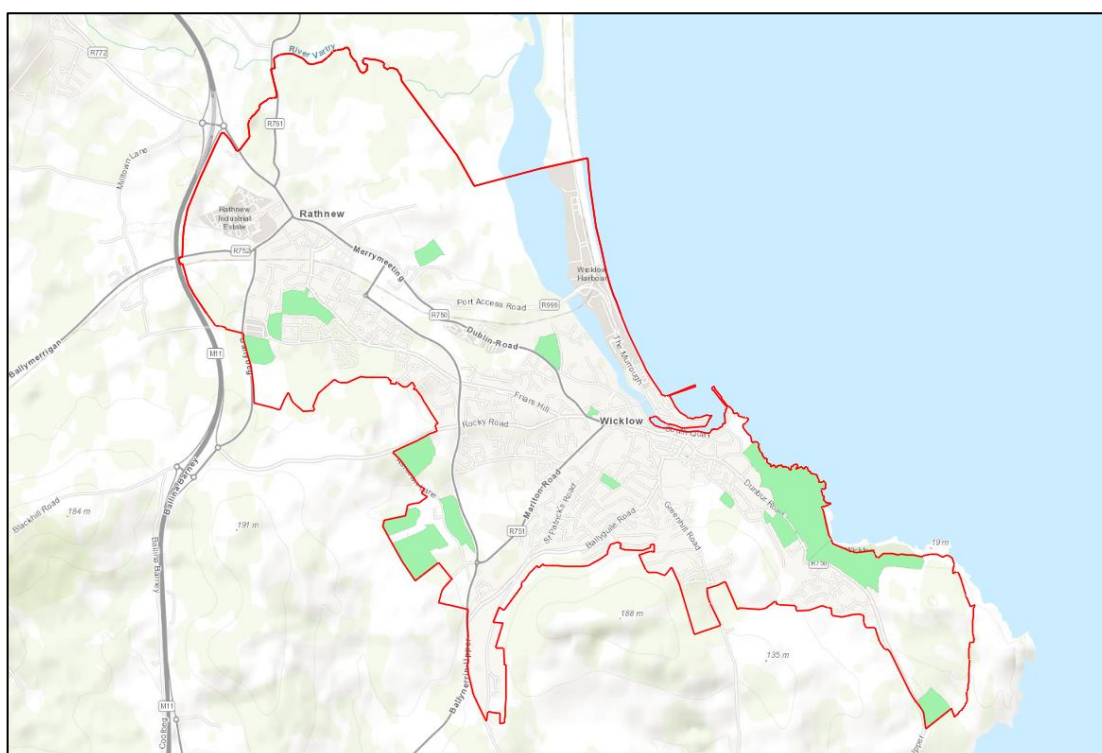


Figure 5.7: Location of lands zoned 'AOS - Active Open Space' within the LAP boundary. (Source: Wicklow County Council, as mapped by Tom Phillips + Associates, 2024.)

In addition to this, we highlight that within the LAP boundary, there is 121.09Ha of land zoned ‘OS1 – Open Space’ and 117.48Ha of land zoned ‘OS2 – Natural Areas’. This provides a combined total of 324.32Ha of ‘AOS’, ‘OS1’, and ‘OS2’ zoned land, as shown in Figure 5.8 below.

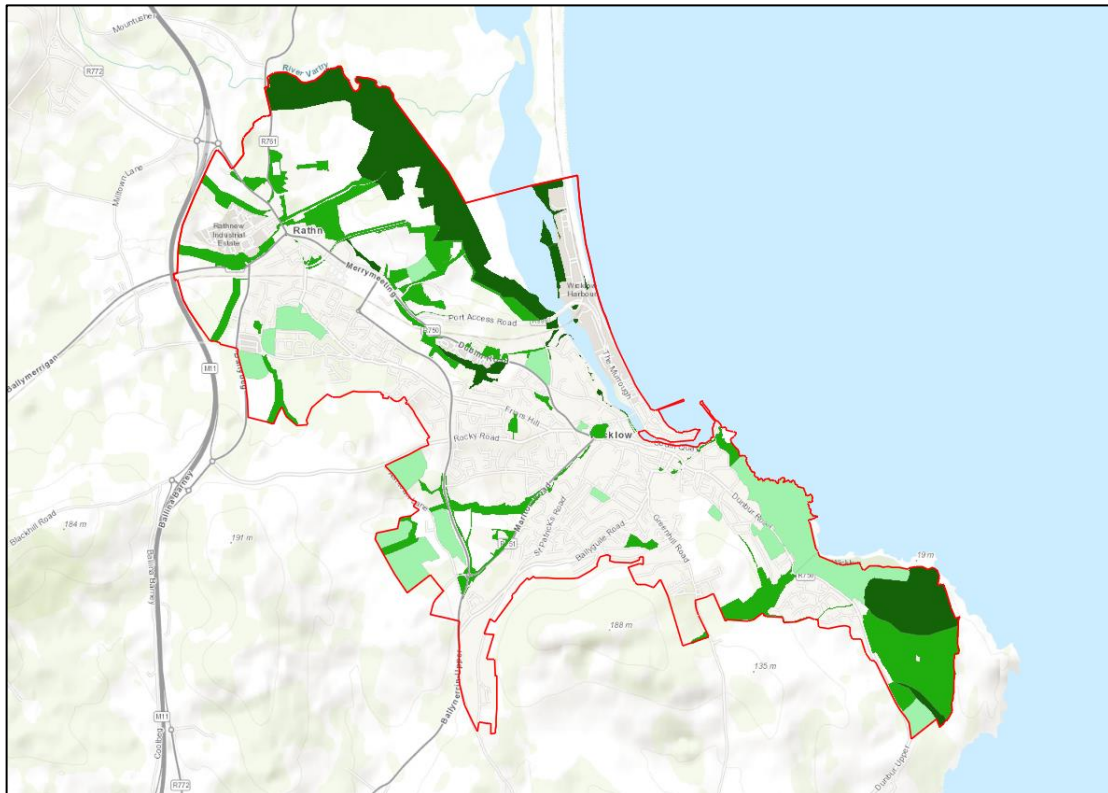


Figure 5.8: Location of lands zoned ‘AOS - Active Open Space’, ‘OS1 – Open Space’, or ‘OS2 – Natural Areas’ within the LAP boundary. (Source: Wicklow County Council, as mapped by Tom Phillips + Associates, 2024.)

We contend that the LAP area includes a very significant quantum of open space, with the area immediately surrounding the subject site being especially well served by Active Open Space. The overall existing open space areas are greatly in excess of the requirements outlined in the *Draft Wicklow Town – Rathnew Local Area Plan 2025*.

5.2.3 Subject Site as an Outlier

When analysing the 7 no. sites identified in the Draft LAP and associated Social Infrastructure Audit as ‘zoned undeveloped land’ (Table 2.18 within the Social Infrastructure Audit), there is a clear rationale behind the rationale for the identification of each of these sites for Active Open Space, save the subject site.

Table 5.2 below provides our understanding of the potential rationale behind the inclusion of each of these sites as ‘zoned undeveloped land’.

Site	Rationale for Inclusion
Hawkstown Road / Ashtown Lane	Previously zoned for this use.
Rocky Road	Within SLO6 - Specifically requested to be rezoned by Wicklow Rovers AFC for 'AOS' to recognise new club facilities currently under construction.
Brides Head	Previously zoned for this use.
Wicklow Rugby Club	Forms part of Wicklow Rugby Club grounds or immediately adjacent to grounds.
Tinakilly	Forms part of residential development under construction.
Ballynabarney, Rathnew	Subject Site – No rationale for inclusion. The site is not located immediately adjoining any other open space zoning and was not previously zoned for this use. Neither the owner of the site nor any third party requested, as part of the Pre-Draft Issues Paper Consultation Stage, that these lands be used for open space.
Bollarney	Within SLO4 – Forms part of linear park to connect with residential development at Tinakilly.

Table 5.2: Assessment of 'Zoned Undeveloped Land' identified in the *Draft Wicklow Town – Rathnew Local Area Plan 2025*.

Of the lands zoned 'AOS – Active Open Space' within the Draft LAP, 5 no. of the sites identified in Table 5.1 above were not zoned as such in the previous development plan: Site Nos. 2, 5, 6, 7, and 8 (the subject site). In addition, we note that the boundary of Site No. 11 has been extended, increasing the quantum of 'AOS' zoned lands at this location.

Sites Nos. 2, 5, and 7 have established active open spaces uses, which have predated the subject Draft LAP, namely the 'Wicklow Rovers AFC Hockey Pitch' at Dunbur, Wicklow Tennis Club, and Coral Leisure and associated pitches (Wicklow Town AFC and Wicklow Rovers AFC). The rezoning of these lands appears to have been done to acknowledge and protect the existing and established use in-situ.

Site No. 6 was previously within the 'Strategic Land Bank' for the LAP, but was specifically requested to be rezoned 'AOS' by Wicklow Rovers during the Pre-Draft Issues Papers Consultation Period for the LAP (Submission No. 63), who are in the process of establishing new club facilities at this location. Site No. 11 includes lands both actively used as part of Wicklow Rugby Club and lands immediately adjoining the rugby club.

The subject site, Site No. 8, is the only site to have been rezoned to 'AOS' as part of the Draft LAP which does not have any established connection to an existing Active Open Space use. The rationale behind the rezoning of this site from a "developable" commercial zoning to 'Active Open Space', has not been outlined in the Draft LAP and was unexpected, given that a submission was lodged at Issues Paper Stage stating the intention of the landowner to develop this site.

We further highlight that it is the only one of the 7 no. sites identified as 'Zoned Undeveloped Land' within the Draft LAP which does not have a clear rationale for the development of these lands for Active Open Space. Neither the Draft LAP nor the associated Social Infrastructure Audit provide any rationale for the rezoning of the subject site save the fact that it was contended that additional land was required for this use. No justification is provided as to why the subject site would be appropriate for this use.

6.0 CONCLUSION

Whilst we acknowledge the importance of Active Open Space within residential communities, we contend that the existing quantum of Active Open Space within the Wicklow Town – Rathnew LAP boundary is sufficient to meet the needs of the LAP population and that the rezoning of the subject site to 'AOS – Active Open Space' is not necessary. The proposed rezoning removes the potential to develop these lands, despite the landowner having the intention and proven track record to develop same for residential or commercial purposes, subject to the final Land Use Zoning for the site.

We contend that the calculation used to determine the quantum of existing Active Open Space and additional quantum of Active Open Space required is flawed and requires re-examination by the Local Authority.

We request that Wicklow County Council reviews the proposed rezoning of the subject site and seek that the previous land use zoning be reinstated, or the site be rezoned to permit residential development.

We look forward to written acknowledgement of receipt of this submission in due course.



John Gannon
Director
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