



# Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Ronan O'Caoimh
Reference:	DWTRLAP-194856
Submission Made	November 20, 2024 10:08 PM

## Map



Map data © OpenStreetMap contributors, Microsoft, Facebook... Powered by Esri

## Site Description:

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**File**

Greenhill Road Submission.pdf, 1.46MB

*20th November 2024*

Dear Wicklow County Council,

Please find attached a series of three submissions regarding the draft Wicklow-Rathnew Local Area Plan. I have provided this note to accompany the submissions because as you will see, the proposed LAP all but wipes out the development potential across virtually all my land in the area, but in particular three of my sites in Wicklow Town (as evidenced in the map I've attached to this letter). Over the last few weeks since the draft has been published, I continue to be struck by the peculiarity of the rezoning proposals for these three sites, particularly as we find ourselves collectively grappling with a housing crisis.

I have lived in County Wicklow for thirty years and have raised my four children here. I founded a biotechnology company which has employed over 500 people in Bray (Trinity Biotech and T-Coag), and now run a residential construction company here (Lowick Homes). I have always, and will always be, heavily invested in the development of the county.

#### *Land in Question*

In the Wicklow Town and Rathnew area, the total consideration for sites I've purchased is in excess of 50 million euro. My reasonable belief at the time of purchase, and my conviction since, has been the current and future potential of the town, and accordingly, the need for housing in the town.

Since those purchases, the sites under my ownership have gone from being fully zoned for residential housing, to then being reduced to Strategic Land Bank zoning under the last LAP, and now in the proposed LAP, they are effectively being thrown out of the development plan entirely with a total de-zoning. This de-zoning is proposed despite the fact that the three sites in question:

1. Are within the defined LAP development or CSO-defined town boundary, and are bordered by other developments or zoned land;
2. Have established connection points for services or indeed are already serviced; and
3. Are accessed via existing roads.

These shared characteristics are why I bought these sites in the first place. It is not unreasonable to expect lands with such compelling characteristics to retain their zoning or indeed improve over a twenty-year period, particularly during an enduring housing crisis. Instead, what has happened is a systematic de-zoning of these three sites in a series of decisions that not only seem bitterly unfair but are impossible to understand.

As an example, the 10 acres at Greenhill Road have essentially been carved out of the proposed LAP boundary to now create an odd-looking peninsula of un-zoned land (see bottom right of the attached map), despite the fact that that existing housing or zoned land borders the whole site, or that new footpaths to the Greenhill Road were only put in by WCC this year, and the fact that the land is fully serviced. It simply does not follow that this land has been removed from the equation. Similarly, the Dunbur Lower land wraps around the existing taken-in-charge Seacliff development and has ready to go services and access (there are even two hammerheads in the Seacliff development to facilitate this).

I have put together the below table to illustrate the severity and scale of de-zoning on the lands in question as you move left to right over the last twenty or so years.

	<b>Zoning at Time of Purchase</b>	<b>Change to Zoning under 2013 - 2019 LAP</b>	<b>Change to Zoning under Proposed 2025 LAP</b>	Change requested in this submission
<b>60 Acres at Ashtown Lane</b>  <b>Water – YES</b> <b>Sewage – YES</b> <b>Access – YES</b>	Zoned Residential and Commercial	8 acres remained zoned as <i>Residential</i> , but remaining 50+ acres put into <i>Strategic Land Bank</i>	8 acres pushed to Residential Phase 2 (RN2) (we have a live planning application submitted for 58 houses on this site), whilst the majority of the remaining land has been removed from the development plan boundary and has no land use zoning	8 acres retains its RN1 zoning (instead of proposed RN2 zoning)  Remaining land zoned as <i>Strategic Land Bank</i> and <i>Active Open Space</i> is examined and considered for a mix of <i>Residential</i> and <i>Active Open Space and other land uses</i>
<b>10 Acres at Greenhill Road</b>	Zoned Residential	Rezoned into	Entire 10 acres has been de-zoned for no-land use whatsoever	Reverse the draft proposal and provide

<b>Water – YES</b> <b>Sewage – YES</b> <b>Access – YES</b>		Strategic Land Bank		Residential Zoning (RN2) for the land
<b>15 Acres at Dunbur Lower</b> <b>Water – YES</b> <b>Sewage – YES</b> <b>Access – YES</b>	Zoned Residential	Rezoned into Strategic Land Bank	Entire 15 acres has been de-zoned for no-land use whatsoever	Reverse the draft proposal and provide Residential Zoning (RN2) for the land

*Changes Requested to the Proposed LAP*

When I consider the rezoning proposals under this draft LAP, the sites under my ownership have been disastrously impacted, without justification. Across the three sites referenced above, and indeed a fourth at Ballybeg, Rathnew where I am part of a partnership that owns 22 acres of land (also disastrously impacted under the draft proposals), I do not believe the urgent need for delivery of housing on sites that are ready to go, is being given enough weight.

As mentioned above, Lowick Homes is our construction company. Over the last 12 months, we’ve built 80 family homes at Littlebrook, Delgany, and the final 27 houses there are underway. At the former Convent lands in Delgany we are building 99 homes, and in Blessington we will begin 58 social housing units, and a further 14 apartments in Greystones in the new year. With a track record of delivering housing, if the sites in question were zoned for Residential (Priority 1), then we would deliver that housing immediately, as is our intention if the current live planning application for 58 houses at Ashtown Lane is granted.

Much has been made of the outdated population targets on which Wicklow Town’s housing targets are based, and it seems inexplicably short-sighted not to take the opportunity to include more residentially zoned land, when we know anecdotally and statistically that the current projections do not reflect the reality on the ground. Acknowledging that the pent up demand for housing will be the hallmark of housing policy until at least 2050, main streets up and down the country and within our county are prospering off the back of development and growing communities within town boundaries.

Committing to the de-zoning of land within a 10-minute walk of the town risks Wicklow Town missing this opportunity, and the economic and social benefits associated with a compact and vibrant community, whilst also delivering housing.

We cannot change the fact that we need more houses, we can only commit to meeting that need and under this proposed plan, we will fail in the duty to do so in the timeframe needed. As an individual, and as a builder who will build, I strongly feel the proposed zoning of these three sites is not only a missed opportunity, but an oversight that should be corrected as follows (briefly, but elaborated on in the attached submissions):

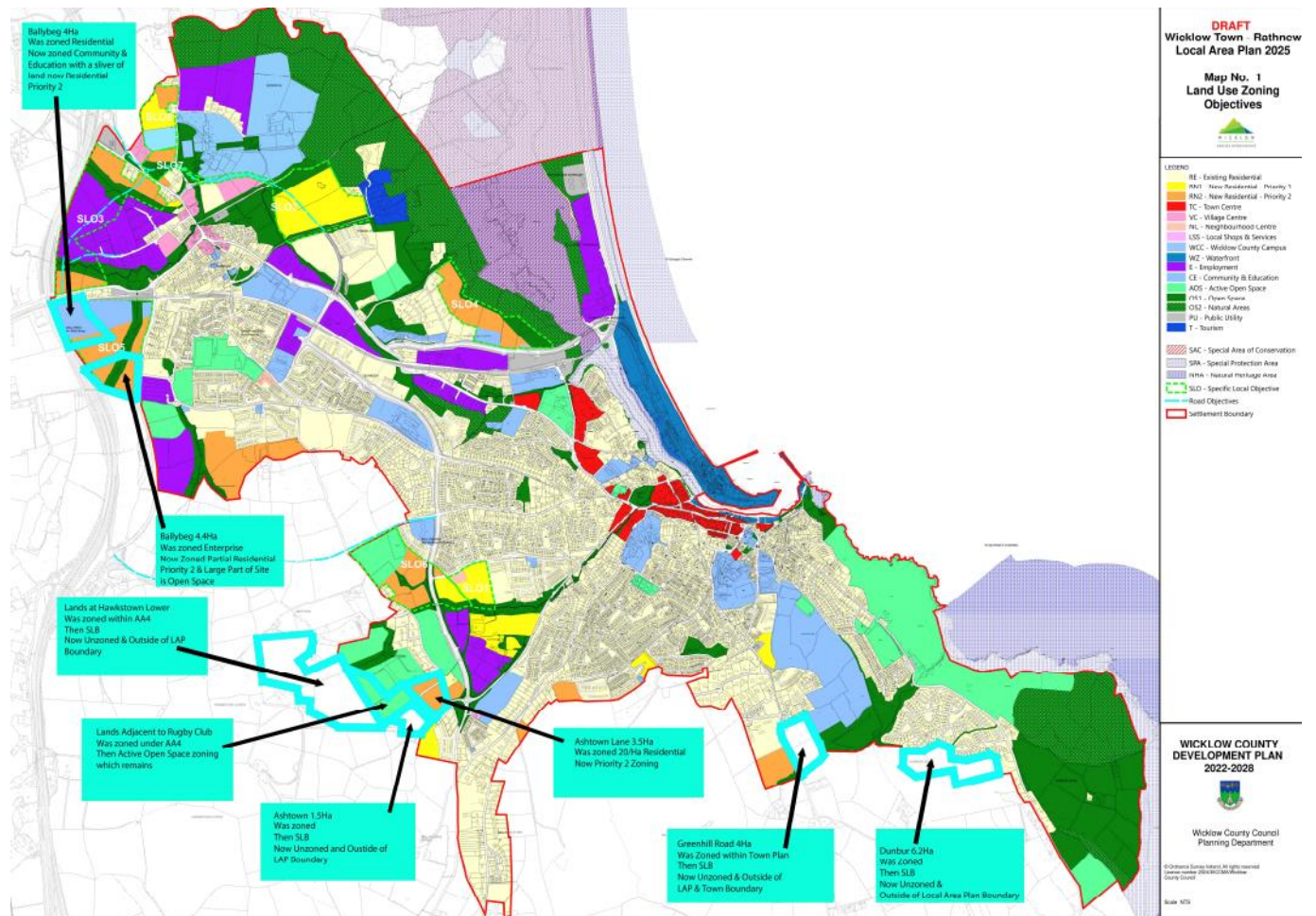
- Change 8 acres at Ashtown Lane from Residential (RN2) to Residential (RN1)
- Change Greenhill Road 10 acres to Residential RN2
- Change Dunbur Lower 15 acres to Residential RN2

I would welcome further discussion on the matter and am available to elaborate on any points made above or in the detail of the submissions within.

Yours sincerely,

Ronan O'Caoimh

## Map Illustrating Change to Zoning Across Lands Under Draft LAP





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Administrative Officer,  
The Planning Section,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow,  
Co. Wicklow.

19.11.24

Uploaded Via Web-Portal:

**RE: Draft Wicklow Town - Rathnew Local Area Plan 2025.**

**Submission Document – Land at Greenhill Road, Wicklow Town**

Dear Sir/ Madam,

On behalf of our client, Mr. Ronan O’Caoimh we hereby make the following submission regarding the Draft Wicklow Town - Rathnew Local Area Plan.

This submission is made in relation to land in our client’s ownership at Greenhill Road, Wicklow Town (Folio Numbers WW 32529F & WW 13717F).

Please refer to the OSI map identifying the location of the extents of the land in Appendix A. The land has an area of circa 4Ha.

**Introduction**

The land which is the subject of this submission was zoned for residential development in the Wicklow Town Plan 2007 to 2013.

It was clearly a devastating blow to our client for the land to be included in a Strategic Land Bank in the 2013 to 2019 Wicklow Town Rathnew Local Area Plan.

All through the intervening 10 year period our client has maintained hope that the land would be zoned for residential development in the upcoming Local Area Plan.



Now, to our client's great disappointment and bemusement, the land in question is not only not zoned for residential development, it is removed entirely from the development plan boundary and now has no land use zoning whatsoever.

The below extract from the Draft 2025 LAP zoning map indicates the location of the land. It clearly highlights that the land is surrounded by zoned land within the proposed development plan boundary and is now a peninsula of unzoned land and outside of the development plan boundary.

The site is clearly an infill site within the development and is surrounded by zoned land. It makes no sense at all to de-zone the land.

The land is bounded by residentially zoned land to the west, existing residential development to the north and lands zoned for community and education use to the east. Our client considers that this is completely unjustified and requests that the decision to take a zoning designation away from the land is reversed in the adopted LAP.

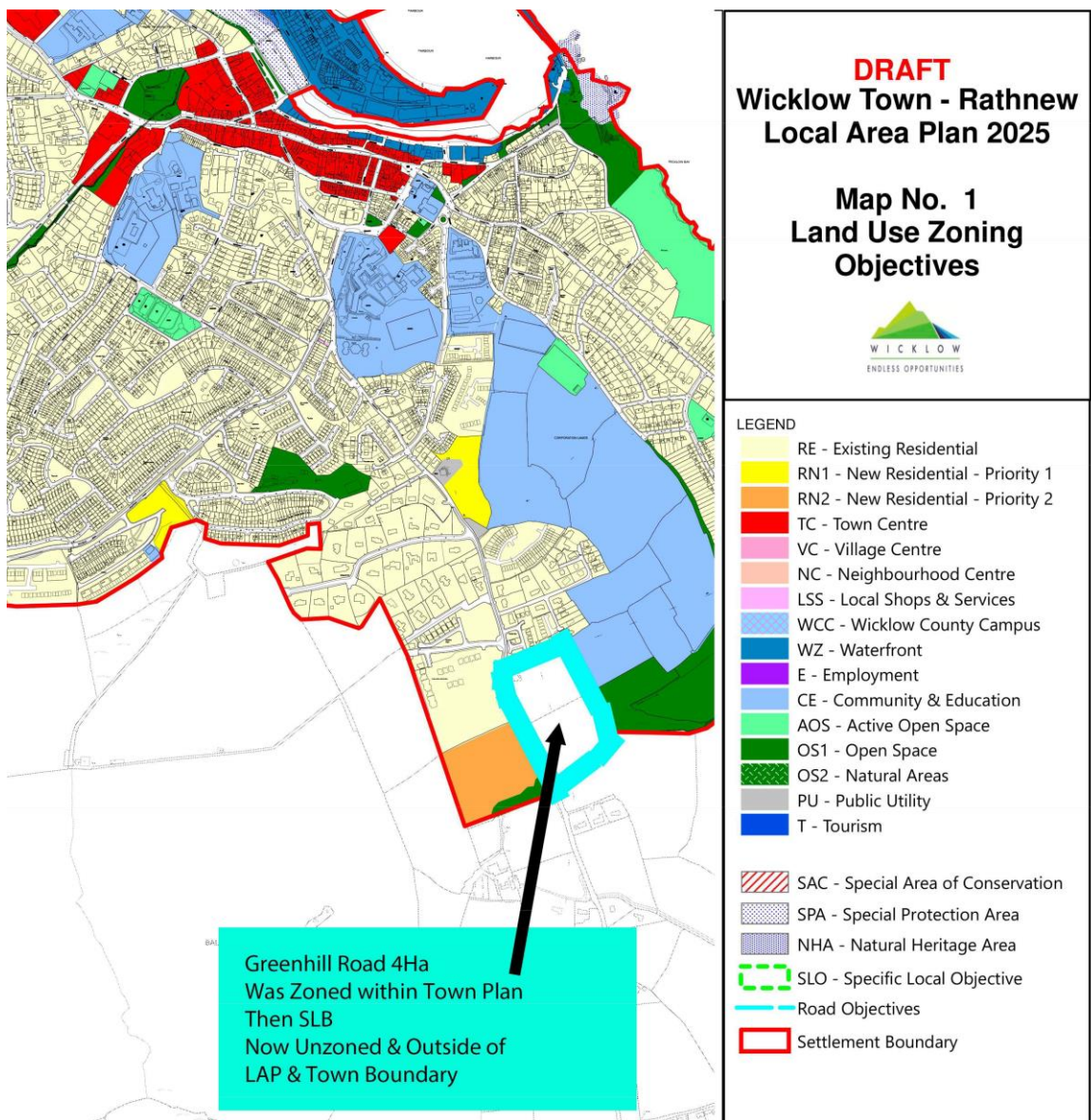


Fig. 1 Extract from Draft 2025 LAP Zoning Map (Land outlined in light blue line)

Our client request that the land be zoned and for Residential Development in the 2025 Lap for the following reasons:

- The land is located with the town boundary (the boundary as defined by the CSO).
- The land is fully serviced.
- The population targets in the County Development Plan and the 2025 LAP are out of date and do not take account of the sizeable population growth that has occurred since the 2022 Census.
- There is an ongoing housing crisis and it is our client's opinion that the land within the settlement boundary should be zoned for residential development. The land was deemed suitable for residential development previously and was purchased on the basis of being zoned for residential development.
- Our client is a builder. Lowick Developments Ltd. are currently completing the build of 108 high-quality dwellings in Delgany, of which in excess of 70 have become occupied in the last 12 months. Lowick are also actively developing the former Convent Lands site, a 99-dwelling development, to be known as Holly Hill, Delgany, with the first units available for occupation in the first half of 2025. If the lands at Greenhill Road are zoned for residential development in the new Local Area Plan it is our client's intention to build much needed high quality houses on the land.

### **Housing – Population – Compact Growth**

This submission addresses the question of where residential development should occur in the future growth of Wicklow Town and Rathnew to provide for new homes up to 2031.

Our client requests that the land be zoned for Residential Development in the new Local Area Plan for the following reasons:

- 1) The land is situated within the Wicklow Town Boundary.

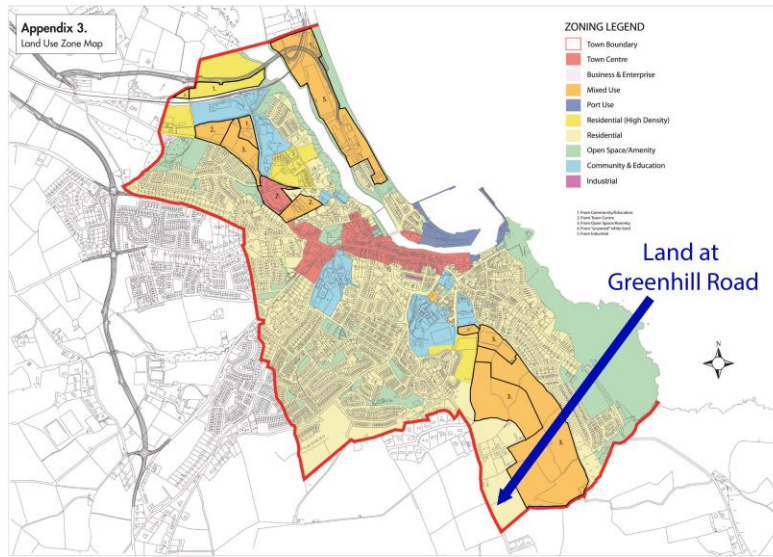


Fig. 2 Extract from Wicklow Town Plan 2007-2013 indicating land with the town boundary (red line).

- 2) It is located within walking distance (1Km) to the centre of the town and will promote the compact growth of the settlement while at the same time reducing the requirement for vehicular journeys and promoting the use of public transport links.
- 3) Foul Drainage: The land is serviced with an existing foul drainage connection. There is an existing foul drain serving the land which also serves the Mariner's Point development to the west of the land. This foul connection is indicated on the below drainage drawing extract submitted as part of Planning Permission 22/504 on the lands adjacent to Mariner's Point. A photo of the foul manholes on the land are also indicated below.



Fig. 3 Extract from Drainage Layout Planning File Ref: 22/504.



Figs. 4 & 5: Photos of existing foul manholes on the land.

- 4) Mains Water: The land is served by an existing water storage tank located at a higher level on the lands to the west of Mariner's Point. There is capacity in this tank to accommodate development on the land. Should Irish Water require an upgrade to infrastructure our client would accommodate the provision of water storage on the land if required.
- 5) Footpath & Road Access: There is a public footpath connection which currently terminates at the northwest corner of the land. Works to extend the footpath along the road side boundary of the land are planned and supported by our client. This footpath will be in place when the new plan is adopted.

The land is fronting onto Greenhill Road. It has direct road access and does not require access across any third party lands.



Fig. 6 Image of existing public footpath to the corner of the land.

- 6) Sequential Development. The development of the land for residential development would constitute sequential development of the settlement considering the existing established residential development located to the west of the land at Mariner's Point and directly adjacent to the north of the land at Carraig View. We also refer to Planning Permission 22/504 where permission was granted in January 2023 for 74 dwellings on the land directly across

Greenhill Road to the west of the land. In the context of the residential developments surrounding the land it should be regarded as an infill site within the town boundary and most suited to future residential development. The development of the land would not constitute urban sprawl and would add to the orderly development of the established settlement.

- 7) The land will provide for approximately 120 dwelling units applying a residential density of 30 units per hectare as set out in table A in the Core Strategy of the County Development Plan.

Below is a masterplan indicating how quality residential development can be achieved on the land. It is expected that the development would consist of a mix of types of dwellings and tenure including duplex apartments, terraced dwellings and townhouses.

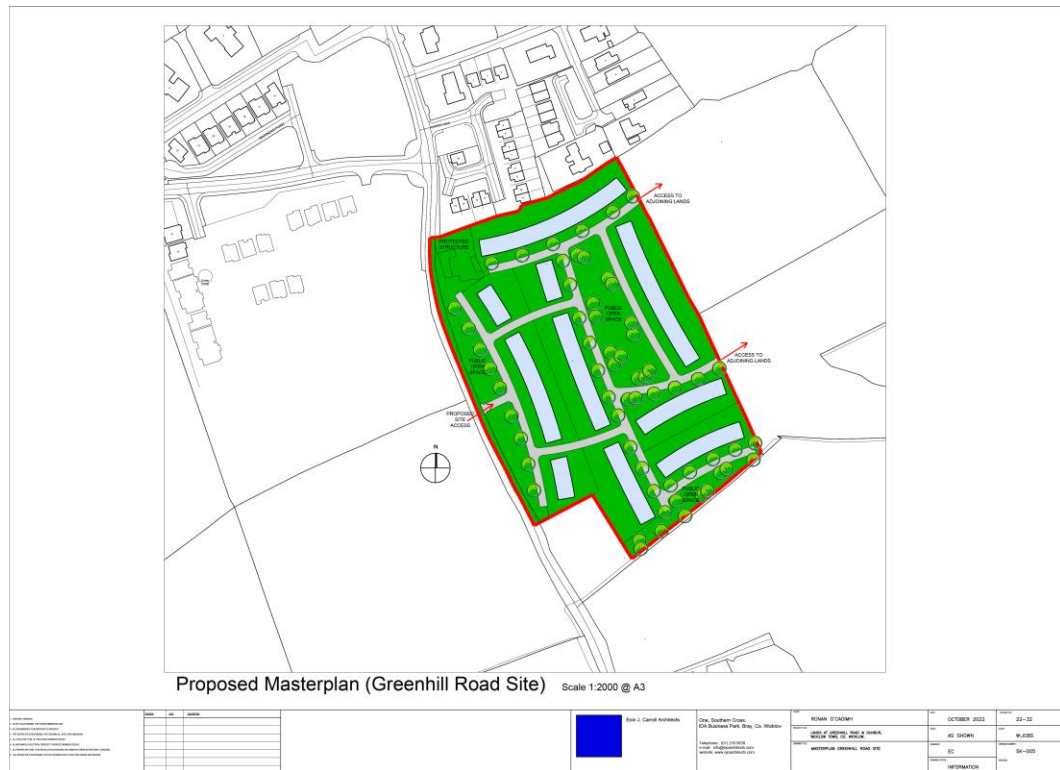


Fig. 7 Image of potential masterplan for residential development of the land.

- 8) Outdated Population Targets. Our client considers that the population targets as set out in the County Development Plan and the Draft Wicklow & Rathnew LAP are outdated and do not take account of the considerable population growth that has taken place since the Census of 2022. We refer in particular to the statistics published on the CSO website ([www.cso.ie](http://www.cso.ie)) on the 27<sup>th</sup> of August 2024 as follows:

**Population and Migration Estimates, April 2024**

***In the year to April 2024, the population of Ireland saw the largest 12-month increase since 2008***

*CSO statistical publication, 27 August 2024, 11am Online ISSN: 2009-5226.*

*Key Findings*

*In the 12 months to the end of April 2024:*

- *The population in Ireland rose by 98,700 people which was the largest 12-month increase since 2008.*

*Regional populations:*

*The proportion of the population residing in Dublin has risen from 27.6% of the total in 2011 to 28.5% of the total in 2024 and is now at 1,534,900 people, an increase of 33,400 since April 2023.*

*The Mid-East and South-West had the second and third highest population by region with 785,000 and 773,500 people respectively, or a 14.6% and 14.4% share of total population in April 2024. Counties of the Mid-East, South-West, and Dublin NUTS 3 regions (Dublin, Kildare, Meath, Wicklow, Louth, Cork and Kerry) together had a 57.5% share of the total population in April 2024, with just above three million people.*

*In April 2024, the region with the lowest contribution to the total population was the Midland region with 330,900 people (6.2%) followed by the Border (439,800 or 8.2%), South-East (474,800 or 8.8%), West (509,000 or 9.5%) and Mid-West (532,400 or 9.9%) regions.*

The above population growth and future increased growth rate levels are not factored into the population targets in the County Development Plan or the Draft Wicklow Rathnew LAP.

It is noted that outside of Dublin the Mid-East region is the second largest growth area in the country since the 2022 census.

It is considered that the population targets in the plans are not robust enough to cater for future housing requirements and housing targets are too low considering the level of population growth that is occurring.

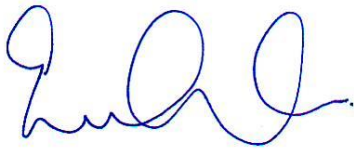
In the midst of a housing crisis would it not be prudent to take these growth rates into consideration and factor them into the new LAP. This would require an additional amount of land zoned for residential development in the LAP.

Our client considers that their land is ideally located to cater for this increased demand for future housing.

We trust the above items will be considered by the Planning Authority and we request that the land be zoned for Residential Development in the drafting of the new Local Area Plan.

In the meantime, if your department has any questions regarding any of the above please do not hesitate to contact the undersigned.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Eoin J. Carroll', written in a cursive style.

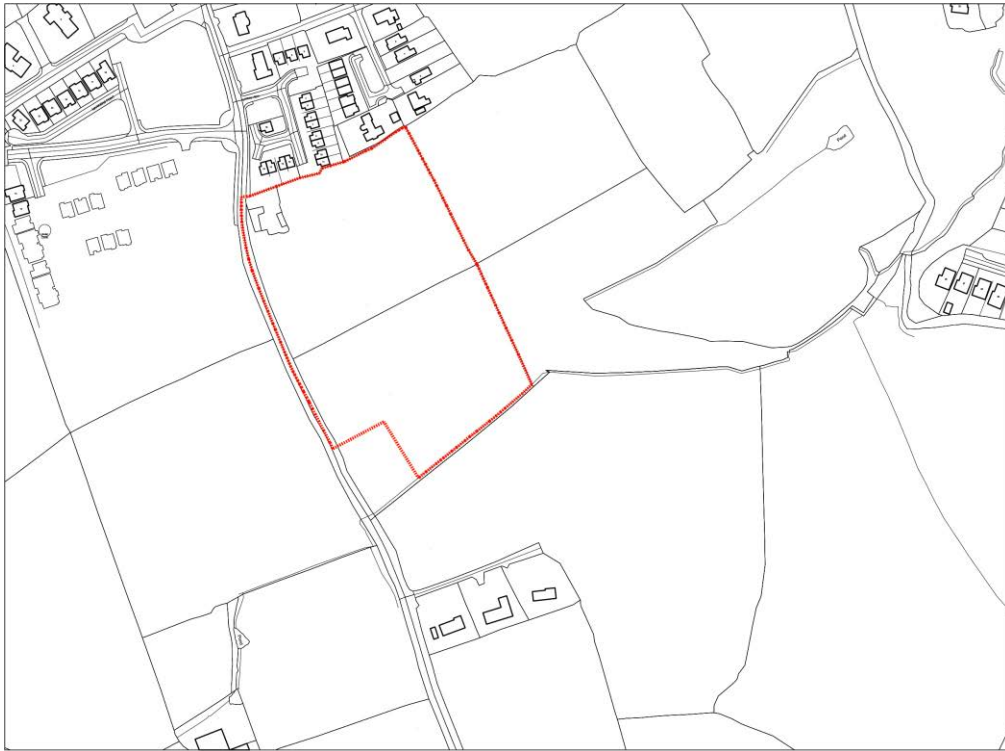
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Eoin J. Carroll MRIAI

*For Eoin J. Carroll Architects*

*cc. Ronan O'Caoimh*

# Appendix A: Site Location Map (OSI Map)



Description	OSI Map
Publisher / Source	Ordnance Survey Ireland OSD
Data Source / Reference	OSD
File Format	AutoCAD DWG
File Name	OSI_Map.dwg
UIC Extent / Area of Interest (M2)	UIC Extent: 7276000.0000000000 UIC Area: 7276000.0000000000
Projection / Spatial Reference	Projection: OSGB36 Irish Transverse Mercator
Centre Point Coordinates	Centre Point: 7276000.0000000000 7276000.0000000000
Reference Datum	OSGB36
Map Series / Map Sheets	OSGB36 4000-A
Data Extraction Date	2023-10-20
Source Data Release	OSD Release V1206113
Product Version	Version 1.0

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