



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	HK Partnership
Reference:	DWTRLAP-175606
Submission Made	November 19, 2024 5:59 PM

Topic

Land Use Zoning Map

Submission

Please refer to the enclosed submission, made on behalf of HK Partnership.

File

Q72824 Draft LAP Submission v2.0.pdf, 1.26MB

Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Tuesday, 19th November 2024

Dear Sir/Madam,

RE: SUBMISSION IN RESPECT OF THE DRAFT WICKLOW TOWN – RATHNEW LOCAL AREA PLAN 2025 AS IT PERTAINS TO 2 NO. SITES AT BROOMHALL BUSINESS PARK

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹ have been retained by HK Partnership² to prepare this submission in respect of the *Draft Wicklow Town – Rathnew Local Area 2025* (Draft LAP). Specifically, this submission pertains to 2 No. sites at Broomhall Business Park in Rathnew.

1.1 Requests of this Submission

This submission comprises a series of key requests, which we have summarised below:

- At the southern site:
 - That the Council continue to retain the 'E – Employment' land-use zoning designation.
 - That the Council retains the current range of typical uses open for consideration on 'E – Employment' zoned lands.
- At the northern site:
 - That the Council amend the zoning of this site from 'E – Employment' and 'PU – Public Utility' in the Draft LAP **to either** 'LSS – Local Shops & Services' **or** 'NC – Neighbourhood Centre' in the final, adopted LAP.

2.0 SITE LOCATION

The subject sites are located in the area known as the Broomhall Business Park in Rathnew. They are separately identified as a northern site of approximately 1.05 Ha that is L-shaped and a

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² Oaklawn, Bollarney, Wicklow Town, Co. Wicklow

southern site of approximately 0.24 Ha that is square-shaped. The sites are shown on Figure 2.1 below, as well as on the zoning maps in Figures 3.1 and 3.2 below.

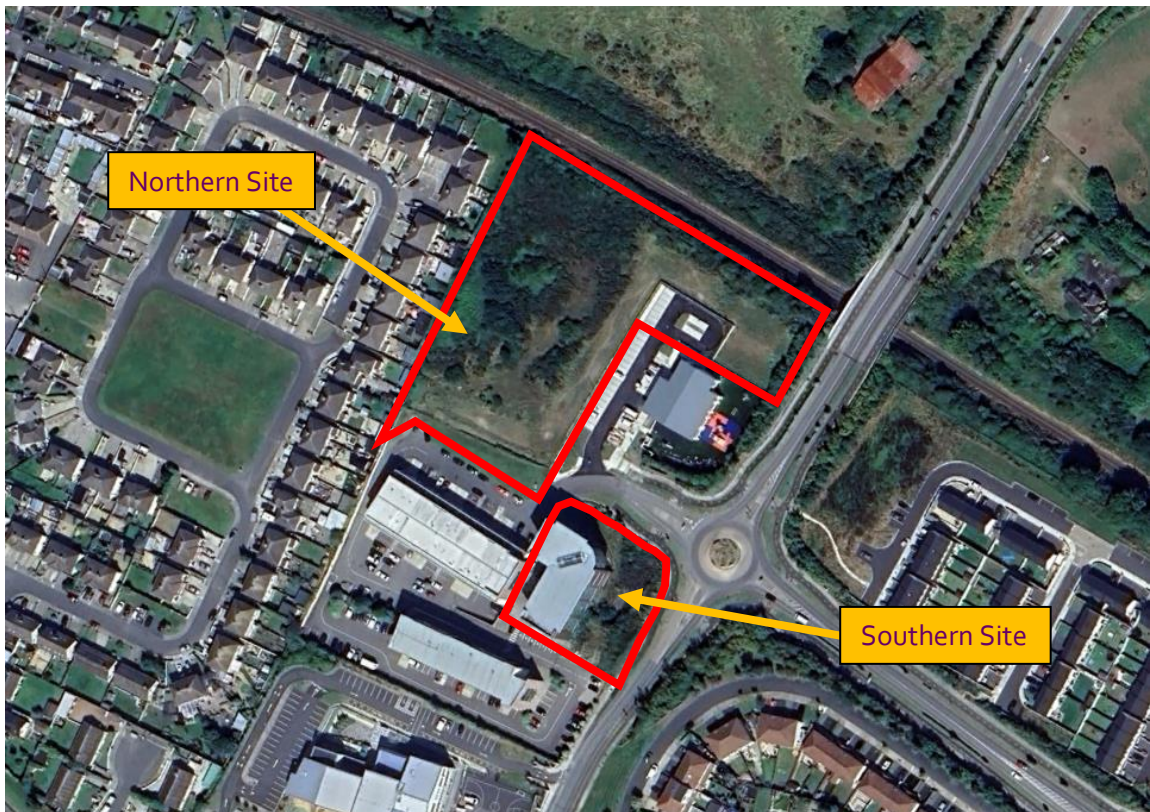


Figure 2.1: Location of the subject sites (indicatively outlined in red)

Source: Google Earth (2024, image 12th August 2024), annotated by Thornton O'Connor Town Planning (2024)

The sites are located in a fast-changing and evolving part of the combined Wicklow Town – Rathnew settlement, albeit closer to the Rathnew Village ‘node’. This part of the settlement has experienced considerable population growth in recent years, as well as a broadening of local land-uses, including employment, education, childcare, retail, etc. Therefore, the area is very much mixed-use in nature and a hub of activity is evident in the immediate environs of the site due to the presence of:

- Substantial housing;
- St Coen’s National School;
- Gaelscoil Chill Mhaintáin;
- Little Harvard Childcare;
- Wilton Clinic;
- Merrymeeting Shopping Centre;
- Rathnew AFC;
- Rathnew GFC; and
- Multiple businesses within Broomhall Business Park.

However, this growing population will require a further enhancement of local services and amenities to sustain them, especially as the settlement’s nodes continue to merge and consolidate in the area between Wicklow Town and Rathnew Village Centres.

3.0 ZONING DESIGNATIONS ON-SITE

The Draft LAP has zoned the southern site as 'E – Employment', which is similar to the 'E1 – Enterprise and Employment' zoning prescribed by the *Wicklow Town – Rathnew Development Plan 2013–2019*. The northern site is zoned in the Draft LAP as 'E – Employment' and 'PU – Public Utilities', which partially reflects the 'E1 – Enterprise and Employment' zoning also prescribed by the *Wicklow Town – Rathnew Development Plan 2013–2019*.

Proposed and existing zoning designations are displayed in Figures 3.1 and 3.2 below.

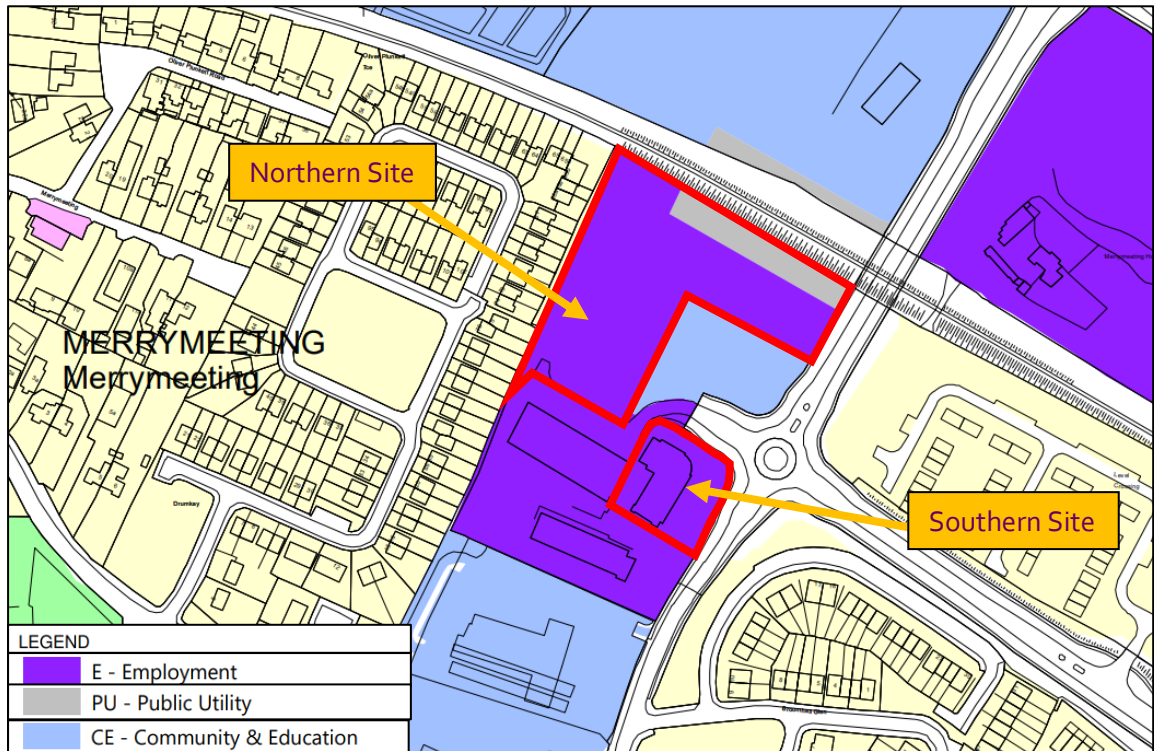


Figure 3.1: Zoning of the subject site (indicatively outlined in red) per the Draft LAP

Source: *Draft Wicklow Town – Rathnew Local Area Plan 2025 (2024)*, annotated by Thornton O'Connor Town Planning (2024)

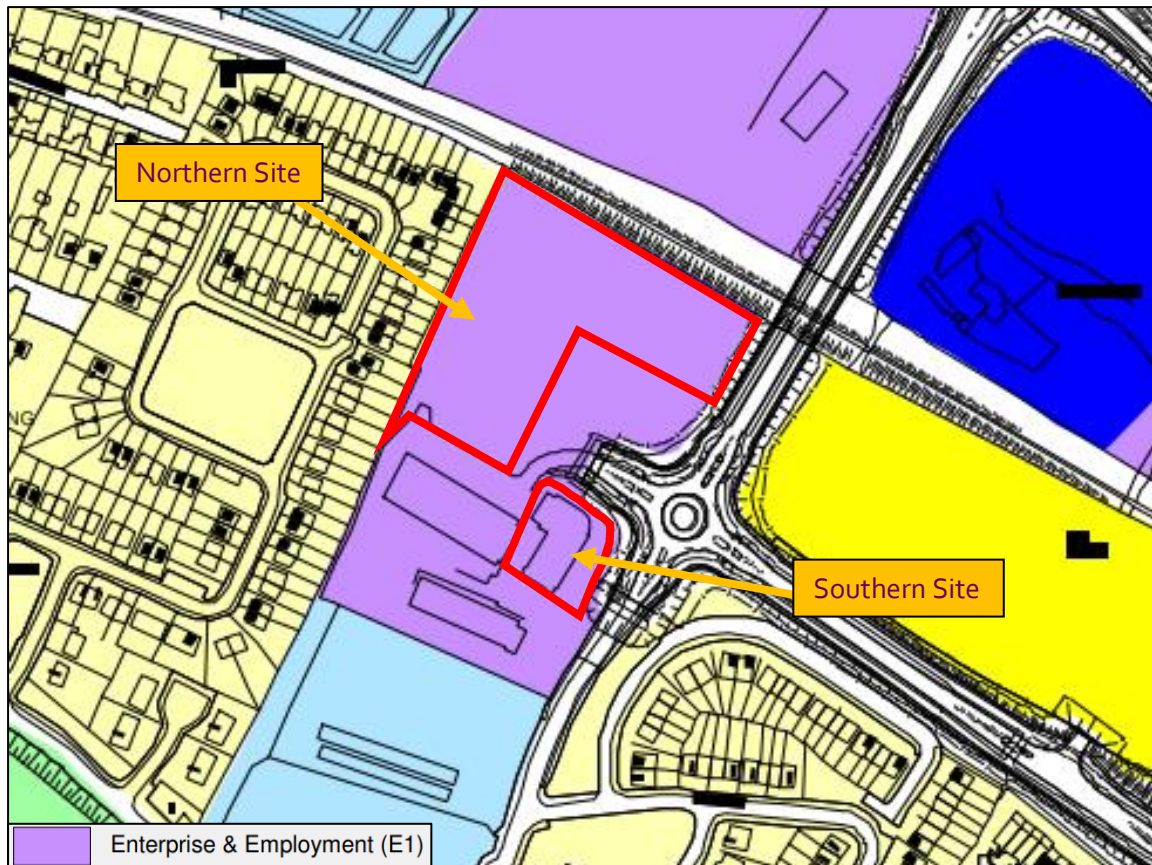


Figure 3.2: Zoning of the subject site (indicatively outlined in red) per the *Wicklow Town – Rathnew Development Plan 2013–2019*

Source: *Wicklow Town – Rathnew Development Plan 2013–2019* (2013), annotated by Thornton O'Connor Town Planning (2024)

4.0 ZONING AT THE SOUTHERN SITE: REQUEST TO RETAIN THE 'E – EMPLOYMENT' ZONING

The southern site has a long history of an employment/economic zoning, but without appropriate utilisation. After the structure on-site was completed in approximately 2008, it failed to be occupied and this has continued to be its status since then. Our Client has made efforts to secure occupants and pursued avenues to zoning changes and changes of use. However, these have not been successful to-date.

However, the 'E – Employment' zoning of the subject site is now requested by our Client to be retained. They are actively engaging with a potential future occupant for the structure at the site. This would, however, require a change of use of the building from office. If an agreement is successfully reached, this proposal will be presented to the Council.

Our Client also welcomes the relatively broad range of "typical appropriate uses" that applies to the 'E – Employment' zoning designation and requests that the current text in respect of same is retained.

5.0 ZONING AT THE NORTHERN SITE: REQUEST TO AMEND THE 'E – EMPLOYMENT' AND 'PU – PUBLIC UTILITIES' ZONING TO 'LSS – LOCAL SHOPS & SERVICES' OR 'NC – NEIGHBOURHOOD CENTRE'

Our Client respectfully requests that the 'E – Employment' and 'PU – Public Utilities' zoning designations shown on the northern site in the Draft LAP **are changed to either** 'LSS – Local Shops & Services' **or** 'NC – Neighbourhood Centre' in the forthcoming final version of the LAP.

LSS Zoning

The LSS zoning has an objective to *"...provide for small scale local neighbourhood shops and services."* Its 'description' in the Draft LAP states:

"To facilitate the limited development of small scale local neighbourhood shops and retail services and other local service uses that meet only the retail or service needs of residents in the immediate catchment and are not of such a scale or type that would detract or draw trade from lands designated town centre."

The uses that the Draft LAP lists as being *"generally appropriate"* on the LSS zoning include:

"...retail, retail services, health, public house, guest houses, parking, residential development, commercial, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for local shops and services uses in accordance with the with the [sic] CDP and LAP."

NC Zoning

The NC zoning has an objective to *"...protect, provide for, and improve a mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community."* Its 'description' in the Draft LAP states:

"To provide for small scale mixed use commercial / community / retail developments that serve only an immediate catchment or planned new areas of significant residential expansion."

The uses that the Draft LAP lists as being *"generally appropriate"* on the NC zoning include:

"...retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, residential development, commercial, education, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for neighbourhood centre uses in accordance with the with the [sic] CDP and LAP."

The uses and objectives are broad enough to provide ample and appropriate development options, especially given the limited development and occupation interest in E-zoned sites at this specific location (a matter previously raised with the Council and Planning Department prior to and during the Pre-Draft stage of the LAP). However, the offerings are also localised in nature and reflective of both the site's relatively contained size and immediate context and need, as articulated in Section 2.0 above and in the paragraphs below. It will provide a land-use zoning designations that can more directly and effectively provide uses that will meet the needs of local residents, workers and patrons.

As illustrated in Section 2.0 above, the site is in a highly mixed-use location and this is particularly evident in Broomhall Business Park where a range of business are currently present, the childcare facility has recently opened and our Client is progressing to secure a new occupant for the currently vacant office building. **Thus, the LSS or NC zoning on-site will both bolster and complement these uses, creating a cluster of different uses as advocated for in policy as it (1) encourages active modes of transport and (2) aligns with the principle of the '15-minute city'.**

The LSS or NC zoning at this site has the potential to deliver a localised offering of retail spaces, personal and professional services units, housing and community/recreational uses.

We have reviewed the current distribution of 'mixed-use' zonings (TC, NC and LSS) in the Rathnew side of the combined settlement and identified them on Figure 5.1 below. Evidently, there is a strong clustering around the core of the 'historic' Rathnew Village Centre. This includes a host of small-scale mixed-uses at the junction/roundabout of Main Street / R750 / R772, as well as bigger box spaces such as Aldi and Costa Coffee. However, despite strong residential and community use growth to the south-east of the Village Centre, there has been little expansion of mixed-use zoning designations in this direction (Figure 5.1).

In fact, when we estimate the walking times from the entrances of several of these new residential developments to the Aldi in Rathnew Village (the nearest convenience outlet of notable size), it is evident that many of these estates are not currently being served by this key offering (**amongst others**) within a 10- or 15 -minute walk:

- Brookfield Park – 20 minutes;
- Saunders Lane – 21 minutes;
- Kirvin Hill – 21 minutes; and
- Sea Scape – 24 minutes.

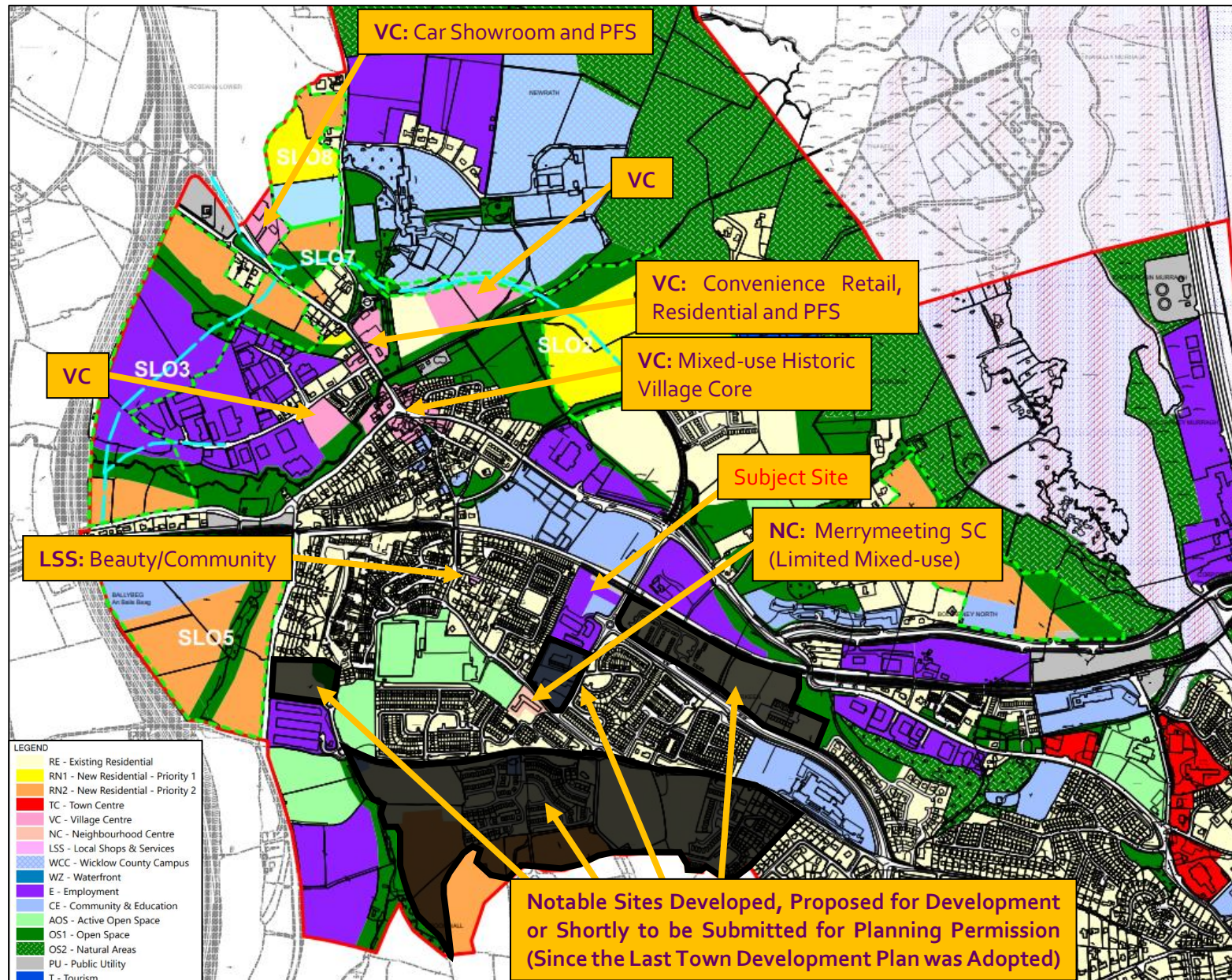


Figure 5.1: Village Centre (VC), Neighbourhood Centre (NC) and Local Shops & Services (LSS) zoned sites in the Rathnew area of the combined settlement, with evident of notable clustering around Rathnew Village

Source:
Draft Wicklow Town – Rathnew Local Area Plan 2025 (2024), annotated by Thornton O'Connor Town Planning (2024)

The consequence is local residents and workers are reliant on trips into the relatively congested centres of Rathnew and Wicklow. We contend that the broadening of the mixed-use potential and offering at the subject site will counter the pattern of development that is occurring; facilitating a range of uses proximate to existing and expanding areas, thus supporting active modes of transport and bolstering the delivery of mixed-use communities.

In light of the above, we draw the Council's attention to Section 1.3.2 ('Compact Growth') of *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024), which provides guidance for Planning Authorities in respect of the benefits associated with the proposed zoning change:

*"The term '15 minute city' has been used in recent years to describe compact neighbourhoods with a **range of local services and amenities and access to public transport all within a short walk or cycle of homes** (Figure 1.2 refers). This should be the **overarching objective when planning for sustainable residential development and compact settlements**. **Planning authorities at settlement level should plan for an integrated network of well-designed neighbourhoods that can meet day-to-day needs (such as food, healthcare, education, sports and professional services) within a short 10 to 15 minute (approx.) walk of all homes.**" [emphasis added]*

Therefore, we robustly contend that there is a strong case to be made for amending the northern site's zoning to either LSS or NC, thereby allowing for the development of a range of appropriate uses in terms of scale, offering and amenity.

Whilst we acknowledge that the Planning Department may have concerns that an LSS or NC zoning at the northern site may undermine or impact existing VC, NC or LSS sites, we contend that in addition to the sound planning rationale presented above, it will ultimately be necessary **for the Applicant of a future Planning Application** to carry out any necessary assessments or audits to determine the risk of impacts (e.g. vacancy audit or retail impact assessment). This will, of course, be dependent on the future uses proposed at the site.

6.0 CONCLUSION

We trust the above points are clearly articulated and that they provide the Council with sufficient insight to action the requests, most notably amending the northern site's zoning **from** 'E – Employment' and 'PU – Public Utilities' as shown in the Draft LAP **to either** 'LSS – Local Shops & Services' **or** 'NC – Neighbourhood Centre' in the forthcoming final version of the LAP.

We look forward to the next stage of the LAP's drafting, but please do not hesitate to contact the undersigned in the meantime should you require further insights.

Yours faithfully,



Sadhbh O'Connor
 Director
 Thornton O'Connor Town Planning