



## Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Sheehan Planning (gent) on behalf of Stafford Family Partnership
Reference:	DWTRLAP-152725
Submission Made	November 14, 2024 3:33 PM

### Topic

Land Use Zoning Map

### Submission

The submission asks that the draft 'Employment' zoning be reconsidered in light of prevailing market circumstances and best use of the land.

### File

SFP Sub to Draft LAP.pdf, 0.55MB

Appendix 1 to SFP Sub to Draft LAP.pdf, 1.5MB

Appendix3 to SFP Sub to Draft LAP.pdf, 0.48MB

Administrative Officer  
Planning Department  
Wicklow county Council  
County Buildings  
Station Road  
Wicklow Town

14 November 2024  
(Pdf. attachment via web portal  
<https://wicklow-rathnew-lap-wicklow.hub.arcgis.com/>)

## STAFFORD FAMILY PARTNERSHIP ('SFP') SUBMISSION TO DRAFT STAGE

### WICKLOW TOWN - RATHNEW LAP

#### 1.0 INTRODUCTION

This a submission on behalf of the Stafford Family Partnership and Killytina Ltd<sup>1</sup>, ('SFP') proposing that the SFP site in Rathnew (Figure 1) be rezoned from 'Employment' to a more realistic and achievable land use.

The total area of the site is circa 3.8ha.



**Figure 1:** Approximate boundary of the subject site in orange.

<sup>1</sup> Stafford Family Partnership and Killytina Ltd, 40 Mary Street, Dublin 1

### 2.0 THE CASE FOR REZONING THE SITE

#### 2.1 The Proposed Employment Zoning on the Site is Unviable

The site is no longer in active use.

For the past several years SFP has sought expressions of interest for continued use of the site (in accordance with its 'E & E' - Retail Warehousing (E3) zoning), but no such interest has materialised. For the purpose of this submission SFP has commissioned a report on the prospects for future 'Employment' related use<sup>2</sup> (copy at Appendix 1) which concludes as follows:

*It is very difficult to see the subject site being developed for Employment Uses on a viable basis during the life of this Draft Plan. Due to a combination of lack of demand particularly for offices, high construction costs, unfeasible development prospects given that current rental levels will not support a positive return on investment.*

*The proximity of new housing developments is a further likely limitation on developing this site for commercial/industrial activity. Adjoining residential uses will likely lead to planning restrictions on the basis of noise, traffic, and intensification of use.*

#### 2.2 PREVIOUS PRE-DRAFT SUBMISSION ON THE SITE

SFP made a pre-draft submission requesting that the site be rezoned to residential use, based on its location and the unviable nature of the then zoning.

That submission cited the need for additional housing and the acute shortage of housing to let in the Wicklow Town- Rathnew catchment. That situation has not changed, with only four rental properties featuring on the Daft website in October 2024, none of which were in Rathnew (see Appendix 2).

We appreciate that our pre-draft submission (copy at Appendix 3) will have been evaluated by WCC and that a determination was nevertheless made to continue a form of employment related use on the site, but the harsh reality is that the stated 'Employment' objective: "To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality employment and enterprise developments in a good quality physical environment" is unlikely to be realised during the life of the LAP.

#### 2.3 SUMMARY OF CURRENT SUBMISSION

The site owners are committed to properly maintaining the site and to continuing their efforts to activate it, notwithstanding the challenges presented by its proposed zoning.

While we maintain our view that the site is particularly well suited to residential use (and that employment use might be a poor neighbour to the surrounding residential lands), we now request that WCC have broader regard to the viability of the proposed 'E' zoning in light of

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<sup>2</sup> Property at Merrymeeting, Rathnew, Co. Wicklow A67 Xh95, High Level Thoughts – Development Outlook Based on Current Zoning – Lavelle Commercial Property, November 2024

realising the objectives of the County Development Plan and the LAP within the life of those Plans, and to consider measures that might assist in delivering development to this highly visible roadside site.

### 2.4 REALISTIC PLAN OBJECTIVES - ACHIEVABLE WITHIN THE PLAN'S LIFETIME

#### 2.4.1 Development Management Guidelines for Planning Authorities 2022

The Guidelines state, in respect of Development Plan Objectives, that they should be should be *'relevant and necessary'* (Guidelines, 5.1).

They further state *'Estimating the land-use zoning requirement for employment development may require some flexibility and a strategic, long-term perspective. However, proposed employment zonings must have a credible rationale, particularly with regard to location and type of employment'* (6.2.5).

In terms of deliverability and measurable objectives, the Guidelines state *'The 'SMART' approach to the development of objectives is recommended – that is, objectives stated in the development plan should be specific, measurable, assignable, realistic and time-related'* (5.3).

The land use zoning approach specified in the Guidelines apply also to LAPs (6.2.1)

We respectfully suggest that the 'Employment' objective for the subject site is not entirely realistic in light of the location and the evidence regarding its historic vacancy, and is unlikely to deliver active use in the lifetime of either the County Development Plan or the LAP, (despite continued proactive efforts by the owners).

#### 2.4.2 Relevant Objective of the County Development Plan 2022-2028 ('the CDP')

*'In this regard, it is considered that the County Development Plan has the following key functions in the achievement of the specific goals and objectives of the LECP and economic development generally:*

*To set out a planning framework for economic development that is in line with the provisions of the Core Strategy.'* (CDP at 2.3.2)

We respectfully suggest that aspirations such as the *achievement of the specific goals and objectives* should have regard to practical deliverability within the lifetime of the Plan.

In circumstances where deliverability is doubtful, then perhaps a different zoning might be considered - or some other measure which would assist with activating the site.

#### 2.4.3 Relevant Objectives of the Draft LAP

The Draft LAP continues the theme of realistic and practical land-use zoning, stating *'Furthermore, this Local Area Plan shall only include objectives that are area specific and*

*achievable, and avoid those that are aspirational or are best dealt with in the annual budget, road works programme, etc.'* (Draft at 1.1)

On a positive note, the Draft LAP appears to recognise the need to activate the site, with an Objective, under the heading 'Future Compact Growth of the Settlement':

*'To facilitate the redevelopment of brownfield opportunity sites within the centre of Rathnew Village including lands at Charvey Lane, along the R752, infill sites/backlands of the village centre, underutilised industrial sites in Merrymeeting, Clermont and Tinakilly'* (Draft LAP, Page 15)

We acknowledge and welcome the Plan's aspiration to activate the site but, for the reasons set out previously, we feel it may not succeed.

The site is centrally located between Rathnew and Wicklow, abutting the main road. There is currently a mains water connection on the site and, with extensive residential development underway in an immediately adjacent site, there is nearby access to foul sewerage and surface water connections. This site could be ready for development within months of being zoned for viable uses.

The owners would welcome some flexibility – such as mixed-use zoning, or inclusion within SLO2, or any other measure that the Planning Authority might consider to make development of the site more achievable within the lifetime of the Plan.

### 3.0 CONCLUSION

As set out above, our clients acknowledge and appreciate the Plan's aspiration to activate the subject site but, for the reasons set out previously, feel it is unlikely to succeed.

Having owned the site for many years, they are anxious to ensure its activation and continued contribution to the area and would welcome the assistance of the Planning Authority to achieve this within the lifetime of the Plan.

We would be happy to provide any additional information that might assist the Planning Authority.

Yours sincerely,



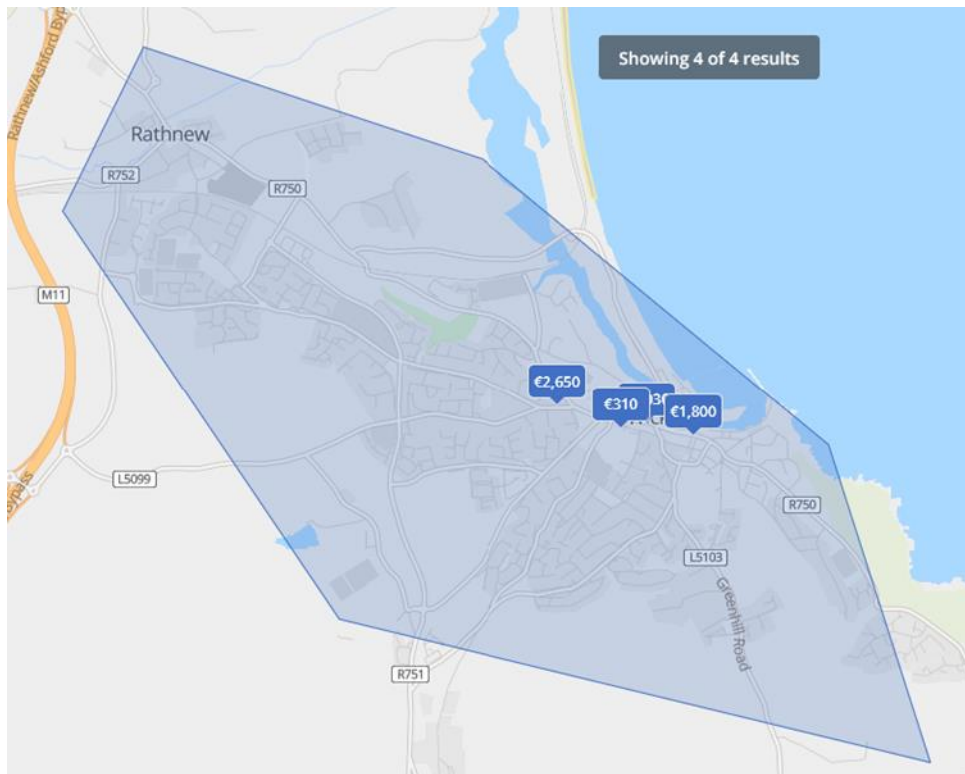
John Sheehan  
**Sheehan Planning**

**APPENDIX 1 – LAVELLE MARKET COMMENTARY**

SEPARATELY ATTACHED



**APPENDIX 2 – EXTRACT FROM DAFT PROPERTY WEBSITE**



Properties for rent in Wicklow Town-Rathnew polygon- searched 21 Oct 2024





**APPENDIX 3 – COPY OF PRIOR SUBMISSION TO PRE-DRAFT STAGE**

SEPARATELY ATTACHED

1227/RL/AOS

8<sup>th</sup> November 2024

Mr. Andy Maher  
Managing Director  
Stafford Fuels Ltd.  
Raheen  
New Ross  
Co. Wexford  
Email: [andy.maher@staffordfuels.ie](mailto:andy.maher@staffordfuels.ie)

**RE: PROPERTY AT MERRYMEETING, RATHNEW, CO. WICKLOW A67 XH95  
HIGH LEVEL THOUGHTS – DEVELOPMENT OUTLOOK BASED ON PROPOSED ZONING**

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Dear Mr. Maher,

As instructed, we outline below our High Level Thoughts on the development outlook for the subject property based on its proposed zoning objective in the Draft Wicklow Town-Rathnew Local Area Plan (LAP) 2025 – “Objective E: Employment”.

**Address:** Merrymeeting, Rathnew, Co. Wicklow.

**Description:** Industrial buildings, outbuildings, yards and site (Folios WW4087F, 10405F, 12971F, 5420F).

Briefly, the property provides a significant dated industrial building in varying states of repair, a dated single storey office building, large concrete surfaced yard and additional undeveloped site area, all on approx. 10.4 acres to include roadbed (approx. Net Area of approx. 9.8 acres). The original industrial buildings are of traditional construction with corrugated roofs, steel frame and concrete block walls. The yard space is part overgrown with mixed or open boundaries.

**Industrial Buildings**      Approx. 2,650 sq. m. (28,500 sq. ft.)

**Site Area (Net of Road):** 4 Hectares (9.8 Acres)

The property has frontage to the R750 Rathnew/Wicklow Road linking back to Junction 16 on the M11 Motorway. Located immediately opposite Rathnew Cemetery and with Tinakilly Park residential development being constructed immediately to the northeast. This is a busy and expanding area convenient to motorway access and major local employers. The avenue to Tinakilly Country House Hotel is on the east side of the site.

Rathnew adjoins Wicklow Town located approx. 46 km south of Dublin with an expanding population and a strong commuter base, benefitting from good motorway access to the M11 and commuter rail links in Wicklow Town.

/...

6A, Sycamore House, Millennium Park, Naas, Co. Kildare, W91 P082  
**Telephone:** 045 540400 **Email:** [info@lavellecs.ie](mailto:info@lavellecs.ie) **Web:** [www.lavellecs.ie](http://www.lavellecs.ie)

## Zoning

Proposed zoning in the Draft Wicklow Town-Rathnew LAP 2025:

<b>E: Employment</b>	To provide for the development of enterprise and employment	To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality employment and enterprise developments in a good quality physical environment.
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Uses generally appropriate for **employment (E)** zoned land include 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.

### Employment Objectives

<b>WTR8</b>	To facilitate and support all forms of employment creation on appropriately zoned land in Wicklow Town -Rathnew and to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets in order to stimulate further employment within the area.
<b>WTR9</b>	To encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the settlement and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided.

**Planning:** No recent (post 2006) planning history as per our online search.

Last planning application (Ref.: 064783 – see below)) refused in April 2006:

*“Dev. on a site of 3.43ha approx. Dev. site is bounded to the sth. by R750 (Rathnew Wicklow Road) to the nw by entrance driveway to Tinakilly Hse (a Protected Structure) & to the nth & est by open ground, demolition of all existing structures on site, construction of a single storey retail warehouse building, with a general parapet height of approx. 9.37m above local ground level (with localised entrance features of 11.66m approx. above LGL, with an overall GFA of 9,320 sqm approx., containing new retail warehouse units (3 No. units at 784sqm, 4 No. units at 807sqm, 1 No. unit at 1,011sqm and 1 No. unit at 2,699sqm) provision of a revised pedest./vehicular (customer & service) entrance to the site from the R750, new access road within the site & car parking for 559 No. cars, ancillary facilities, underground services, water attenuation tanks, sewage pumping station, & site enabling and landscaping wks above & below ground. incl. the prov. of lighting & boundary fencing assoc. sign. 15.5m high”*

**Market Commentary:**

Vacancy Rates:

The national commercial vacancy rate reached a new high of 14.4% in June 2024, with a total of 30,246 commercial units classified as vacant across the State according to the latest GeoDirectory Commercial Vacancy Rates Report. The analysis, prepared by EY, found that the commercial vacancy rate increased in 14 out of 26 counties surveyed.

Commercial Property Market – SCSi Outlook 2024:

The forecast for both retail and capital value expectations for office, industry and retail combined (+3 months) continues to be in the negative territory, with rental expectations at a net balance percentage of -7 and capital value expectations at -27 (Figure 10). In terms of specific property sectors, there is a divergence in anticipated trends across retail, office, and industrial properties. Among all the sectors, prime industrial property is expected to have the highest increase in capital and rental values. For instance, 31% of Chartered Surveyors believe that prime office capital will reduce by between 0% and 5% in 2024 (Figure 11), while the same percentage believe that rents for prime offices will remain unchanged in 2024. For secondary offices, 52% believe that capital will go down by between 0% and 10%, and 43% believe rent will go down by the same margin. In terms of the industrial sector (Figure 12), 42% believe that prime industrial capital will remain unchanged, and 29% believe it will increase by 0-5%. Some 42% of Chartered Surveyors also believe that prime industrial rent will increase by 0-5%. In comparison, secondary industrial capital and rent are expected to remain unchanged by 44% and 42% of Chartered Surveyors, respectively. For the retail sector (Figure 13), prime rental capital is expected to remain the same by 43% of Chartered Surveyors, followed by 23% who believe capital will go down by 0-5%. For prime rental retails, 49% predict “no change”. Furthermore, 25% predict a 0-5% decline in secondary retail capital, and 24% expect the same decline in secondary retail rent. The increased minimum wage and the increase in VAT has further exacerbated the issue of viability for businesses still struggling with the after-effects of Covid-19.

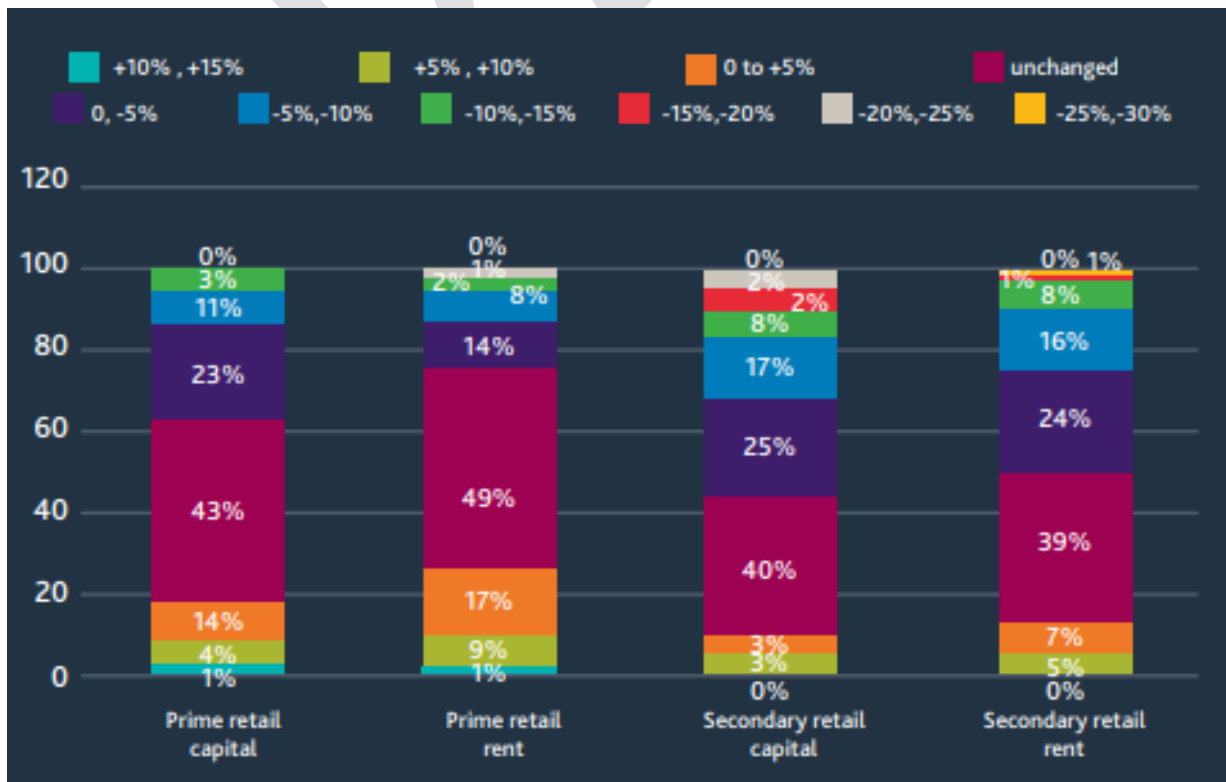


FIGURE 13: Anticipated percentage change in retail rents and capital values in 2024.

## Development Land Market Overview:

- **Demand strongest for €5–10m lot sizes** - In general, smaller lot sizes will be the most active segment of the market in 2024. This is primarily due to funding, as there is less risk funding development costs on small-scale sites than larger ones.
- **Residential sector to remain buoyant** - We expect the preference for residential sites to remain this year as housing supply continues to lag demand. Higher than expected population growth and increasing government housing targets will no doubt continue to underpin this sector.
- **Planning permission is a necessity** - The risks associated with taking a site through the planning system are directing demand towards sites with existing permission. Even sites with residential zoning but lacking planning permission have been slow to move through the market, as few are willing to assume the risk of potential judicial reviews or decision delays. Accordingly, such sites without planning permission are also very difficult to finance.
- **Positive sentiment for the year ahead** - Increased confidence in the economic outlook has had a positive effect on sentiment for 2024.
- **H1 2024** - The Irish Development Land Market has had its strongest H1 since the pre-pandemic years. With close to double digit house price inflation at present, there are several requirements from developers for residential sites nationally. Land availability is a challenge for the remainder of the year, with an urgent need for further rezonings and infrastructure delivery to unlock more opportunities to the market. On the commercial land front, warehouses, hotels and supermarkets lead the way as the most in demand development opportunities currently being sought, however, ongoing construction cost inflation is impacting on the variability of potential speculative developments.

## Local Market:

*Wicklow/Rathnew are well serviced in terms of retail/industrial provision:*

Wicklow Town: Tesco, Supervalu, Lidl, and Heatons (1.25Km). Industrial Estates.

Rathnew: Aldi (approx. 500 metres) & various Industrial Estates (Charvey Lane, Broomhall, South Point).

*On the N11 and within 30 minutes' drive time:*

Bray: Southern Cross Retail Park anchored by Woodies and other locations. Industrial Estates.

Greystones: Meridian Point and significant retail provision in the town. Industrial Estate.

Arklow: Bridgewater Shopping Centre and other locations. Industrial Estates.

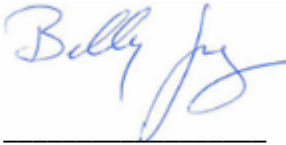
## Conclusion:

It is very difficult to see the subject site being developed for Employment Uses on a viable basis during the life of this Draft Plan. Due to a combination of lack of demand particularly for offices, high construction costs, unfeasible development prospects given that current rental levels will not support a positive return on investment.

The proximity of new housing developments is a further likely limitation on developing this site for commercial/industrial activity. Adjoining residential uses will likely lead to planning restrictions on the basis of noise, traffic, and intensification of use.

We are obliged to state that in accordance with our standard practise that the contents of this letter are intended for the parties to whom they are addressed, and no liability exists to any third party for the entire or any part of the contents.

Yours sincerely,

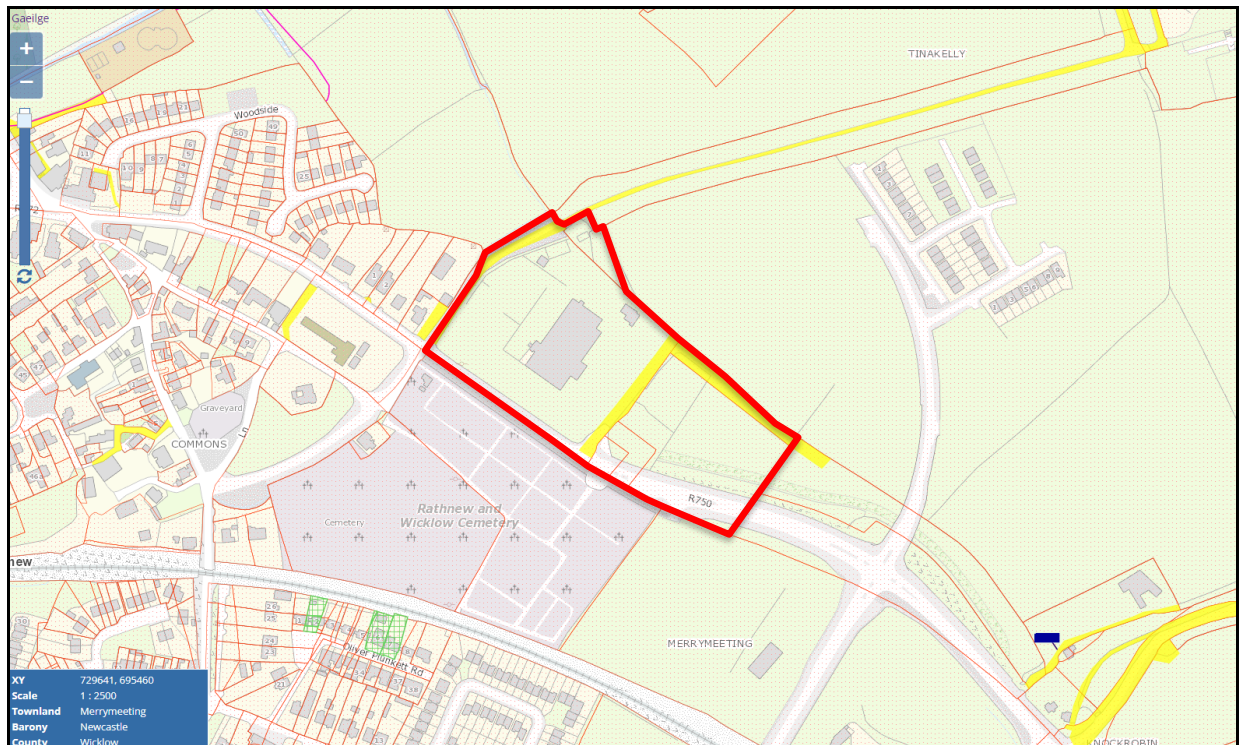
A handwritten signature in blue ink that reads "Billy Grogan". The signature is written in a cursive style with a horizontal line underneath it.

**Billy Grogan**  
**Lavelle Commercial Property**

DRAFT



**APPENDIX 1: (Copy Site Plan)**



**FOR IDENTIFICATION PURPOSES ONLY**

**APPENDIX 2: (Aerial View)**





Administrative Officer  
Planning Department  
Wicklow county Council  
County Buildings  
Station Road  
Wicklow Town

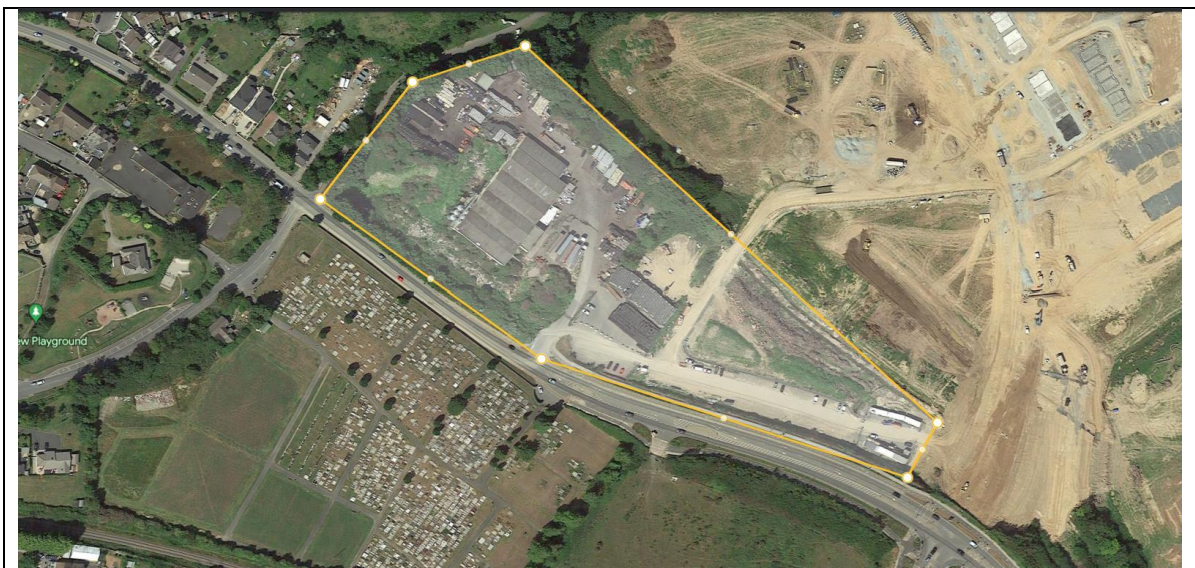
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## STAFFORD FAMILY PARTNERSHIP ('SFP') SUBMISSION TO PRE-DRAFT STAGE WICKLOW TOWN - RATHNEW LAP

### 1.0 INTRODUCTION

This a submission on behalf of the Stafford Family Partnership and Killytina Ltd<sup>1</sup>, ('SFP') proposing that the SFP site in Rathnew (Figure 1) be rezoned from 'Employment and Enterprise' to 'residential' or to a use that includes residential.

The total area of the site is circa 3.8ha.



**Figure 1:** Approximate boundary of the subject site in orange.

<sup>1</sup> Stafford Family Partnership and Killytina Ltd, 40 Mary Street, Dublin 1

**2.0 THE CASE FOR REZONING THE SITE FOR RESIDENTIAL USE**

**2.1 The Current Employment and Enterprise Use on the Site is Unviable**

The current use on the site provides employment for 6 personnel, down from 35 in 2004 but that use is about to cease due to the imminent departure of Stafford Fuels Ltd from the site following the closure of Campus Oil on the site a few years earlier. For the last few years less than 20% of the site has been actively used.

For the past several years SFP has sought expressions of interest for continued use of the site in accordance with its zoning, but no such interest has materialised. In consequence, the site will be closed and put into a maintenance regime from 1<sup>st</sup> November, 2023.

**2.2 There is Severe Shortage of Rental Residential Accommodation in the Plan Area**

Figures from the 2022 Census (see Appendix 1) show that the population of Wicklow County grew by 13,426 between the 2016 census and that of 2022. Wicklow town (excluding Rathdrum) accounted for almost 18% of that intercensal growth.

Figures from the property websites Daft and Myhome (see Appendix 2) demonstrate an acute shortage of rental accommodation in the plan area (3 properties to rent in the Wicklow Town area and none in Rathnew).

**2.3 Further Population Growth is Anticipated.**

The Pre-Draft consultation document sets out that further significant population growth is expected during the lifetime of the plan and that c.1,500 new homes will be needed between now and 2031. Wicklow-Rathnew is identified for a growth rate of 35%

Level	Settlement	Justification
1	Bray	Key Towns are identified for growth rates of c. 35% having regard to their identification on the RSES and are towns suitable for higher levels of growth.
2	Wicklow - Rathnew	

The Pre-Draft consultation document states that 30% of these new homes should be built within built-up areas and town/village centres. This accords with National Policy Objective 3(c)<sup>2</sup> and with the provisions of Volume 3 of the County Development Plan:

The Regional Spatial and Economic Strategy (2019 – 2031) specifically identifies the Wicklow Town-Rathnew area as a locus for residential growth and states as follows:

*Wicklow Town – Rathnew enjoys rail and road access to Dublin City and the wider region, and an abundance of recreational amenities close by including the coast, the harbour and the Wicklow Mountains; as a result there is a high demand for housing in this settlement.*

*Redevelopment and opportunity sites within the core areas of Wicklow-Rathnew will be promoted in the first instance for new residential development, with sites close to transport*

<sup>2</sup> National Policy Objective 3(c): Deliver at least 30% of all homes that are targets in settlements other than the five Cities and the suburbs, within existing built-up footprints.

*infrastructure, recreational and education amenities and employment being prioritised thereafter. (RSES, p.82.)*

We note, in the period 2016 to 2022, that the census shows an increase in population in the plan area of 2,485. This represents an average annual increase (over the 6 years) of 414. If this were to continue for the nine years 2022 to 2031, a further increase of 3,726 would occur.

Even allowing for a household size of 3 persons, this would equate to a requirement of 1,242 units of accommodation by 2031. This does not take account of the current housing shortage in the plan area or of the RSES requirement for significant headroom in terms of spatial planning. A headroom provision of 25% would lead to a requirement of 1,552 to 2031, while a 50% headroom would equate to 1863 units.

### **2.4 The SFP Site is Well Situated to Address the Housing Shortage**

As can be seen from Figure 1, the site is within an existing town/village built-up area, and is bounded to its north, west and northeast by existing or proposed residential development and, further to the north and east, by the new bypass road.

We consider that rezoning the site for residential use would be appropriate in itself and would be in accordance with proper planning and sustainable development.

Additional benefits might also arise, such as increasing the visibility of the entrance to Tinakilly House Hotel from a tourism and safety perspective.

**3.0 CONCLUSION**

We believe that there is a strong case for considering the subject site for residential use or for a use that includes residential and ask that the Planning Authority have regard to this in their preparation of the Draft Plan.

We would be happy to provide any additional information that might assist the Planning Authority.

Yours sincerely,

  
John Sheehan  
**Sheehan Planning**