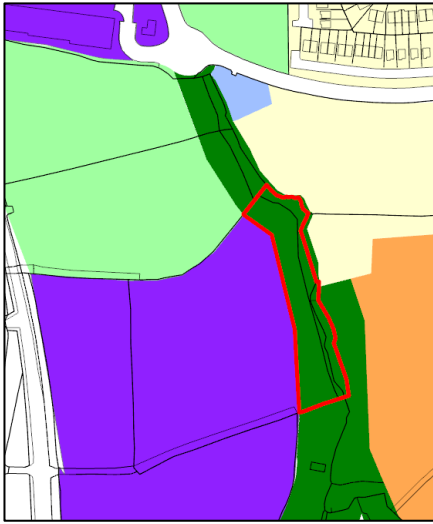
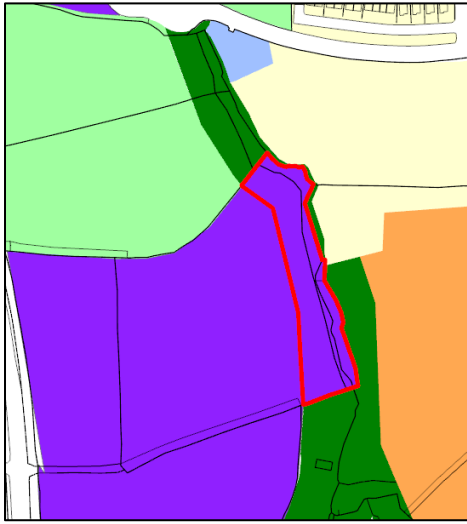
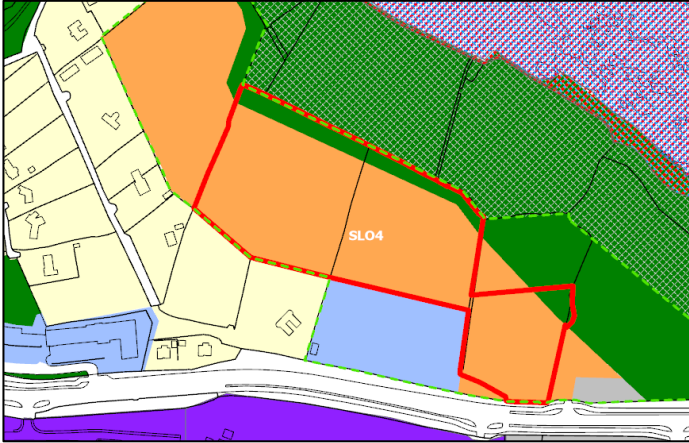
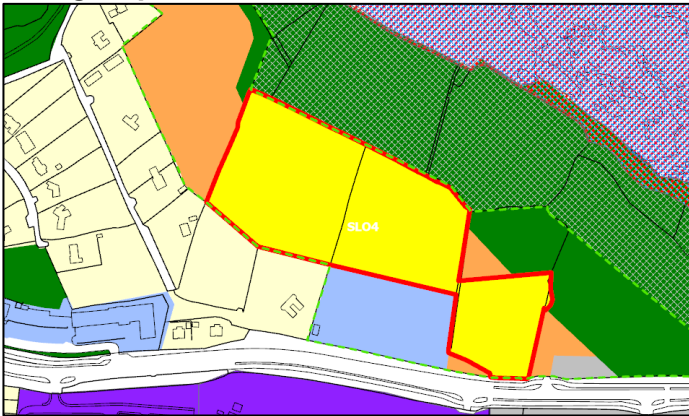


4.3.10 Chapter 11 - Zoning and Land Use

4.3.10.1 Requested changes to Land Use Map Zoning

No.	Name	Issues Raised
5	Wicklow Enterprise Park Ref 152831	<p>It is requested that c. 0.65ha of land at Ballynabarny zoned OS 'Open Space' in the Draft LAP be zoned E 'Employment'. In support of this rezoning the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The land was zoned E 'Employment' in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ The land was zoned E 'Employment' when Wicklow Enterprise Park and Wicklow County Council jointly purchased these lands. <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>Draft Zoning:</p>  </div> <div style="text-align: center;"> <p>Zoning Request:</p>  </div> </div>
Chief Executive Response		
<p>County Policy Objective 17.26 of the Wicklow County Development Plan 2022-2028 states the following:</p> <p><i>'Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.'</i></p> <p>As the objectives of the Wicklow County Development Plan 2022-2028 apply within the area of the Draft Wicklow Town-Rathnew Local Area Plan 2025, the land corresponding to the 'Open Space' zoning would require to be maintained as a riparian buffer zone and therefore OS zoning is most applicable. On this basis, it is appropriate to retain the OS zoning objective.</p> <p>Therefore the CE does not recommend the zoning of these lands for E 'Employment' development.</p> <p>On foot of this submission, no amendments to the LAP are deemed necessary.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

No.	Name	Issues Raised
10	Knockrobbin Developments Ltd. Ref 103018	<p>It is requested that c. 4.55ha of land at Bollarney North zoned RN2 'New Residential – Priority 1' and OS1 'Open Space' in the Draft LAP be zoned RN1 'New Residential - Priority 1'. In support of this rezoning the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Pre-application consultations ongoing on the lands. ▪ Other lands zoned RN1 restrict development to a limited number of landholders, with Tinakilly Park equating to c. 33% of RN1 lands. ▪ Lands within SLO4 are fully serviced. ▪ Land was ceded for the Port Access Road to provide for residential development. ▪ Wicklow Train Station is less than 300m from the lands. ▪ The quantum of land previously zoned R2 in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ Planning history of permitted residential development of 315 No. units on the lands. <p>Draft Zoning:</p>  <p>Zoning Request:</p>  <p>It is further requested that the following text be omitted from SLO4, on the grounds of a preference to provide educational uses as 'normally allowed' under this zoning, without preventing the possibility of a community/sports/recreation type development:</p> <p><i>-'A minimum of 1.2ha on lands zoned CE shall be provided for community uses. Generally, this shall comprise a community / sports/ recreation type development</i></p>

	<p><i>of the highest architectural quality and layout. No more than 30% of the residential lands may be developed in advance of the CE zoned lands being developed and devoted to the use of the general public and not reserved for a single club or activity, in a format and with such facilities to be determined following consultation with the Directorate of the Council responsible for sports and recreation and agreement with the Planning Authority.'</i></p> <p>It is further requested that additional text within SLO4 is altered as follows, on the grounds that the provision of such active travel infrastructure within residential open space, as opposed to within OS1 lands, would be supported:</p> <p><i>'To provide a linear green route for walking and cycling, with a minimum width of 8 metres and a maximum width of 10 metres within the public open spaces lands, on the lands zoned RN1OS1 with pedestrian / cycling access onto the Port Access Road. This route should connect to the residential development in Tinakilly Park, providing a pedestrian/cycling connection to the train station from Tinakilly. (indicative route shown with purple arrow.)'</i></p>
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with the NPF, Ministerial Guidelines (including the 'Development Plans – Guidelines for Planning Authorities' (2022), RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy.

An essential component of the residential zoning strategy is to provide for adequate lands to meet current and future needs, in a clearly articulated and justified phased manner, in accordance with Core Strategy targets. The residential lands needed to meet said targets during the lifetime of the LAP are identified as RN1. The development of phase 2 'RN2' lands is not solely linked to the full / majority development of RN1 lands; the key factor affecting the developability of RN2 lands is consistency with the housing targets of the Wicklow Core Strategy.

Increasing the amount of lands zoned New Residential – Priority 1 (RN1) as suggested in this submission would exceed Core Strategy requirements and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

In addition, the proposed change in zoning requested in this submission would result in a reduction in OS1 'Open Space' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and to ensure maximum protection of the environment particularly in sensitive area such as these close to the Broadlough, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

Therefore the CE does not recommend the zoning of these lands for 'New Residential – Priority 1' development.

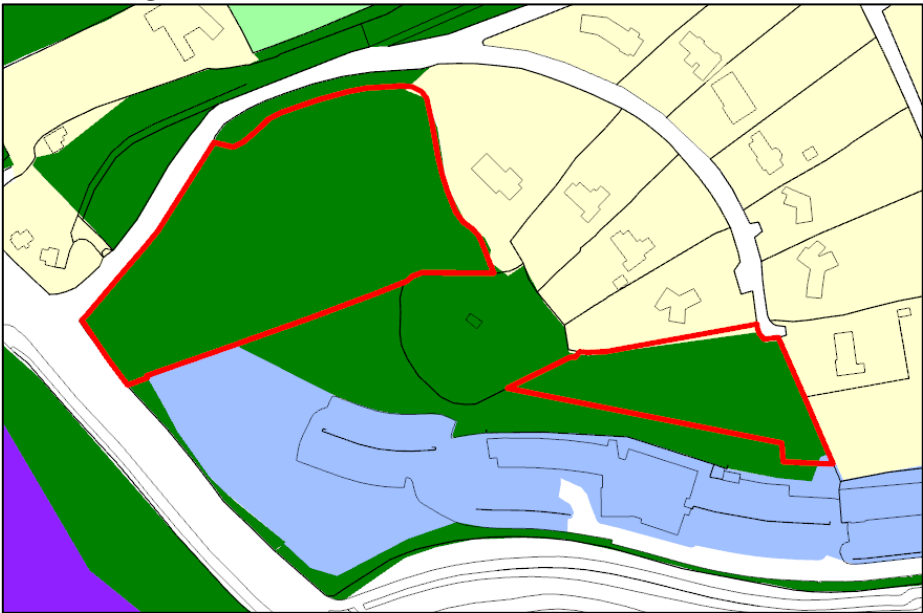
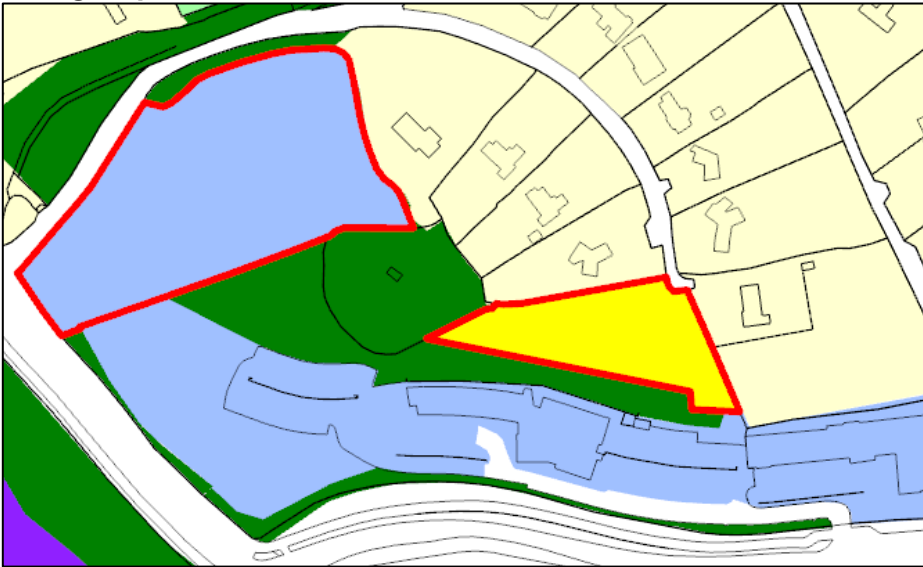
With respect to the request regarding the green route, it is deemed most appropriately located in the OS lands.

No amendments to the LAP are recommended.

Please note that a significant number of additional submissions from parties other than the landowner have been made with respect to SLO4 Bollarney North – please see Chapter 11, Section 4.3.10.2 , SLO 4 Bollarney North and Section 5 SEA / AA of this report.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
14	JEN Properties Ltd. Ref 100325	<p>It is requested that c 1.9ha of land at Knockrobin/Glebe zoned OS2 'Natural Area' in the Draft LAP be zoned for Health Care/Residential (Plot A) and for infill residential development (Plot B). In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Plot A ideally located for a step-down hospital with associated residential units, and provides a 'gateway'/corner building opportunity. ▪ Plot B is ideally located for infill development, located at the end of the Knockrobin estate cul-de-sac. ▪ The subject lands are considered 'Tier 1' serviced and outside of any flood risk zone. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

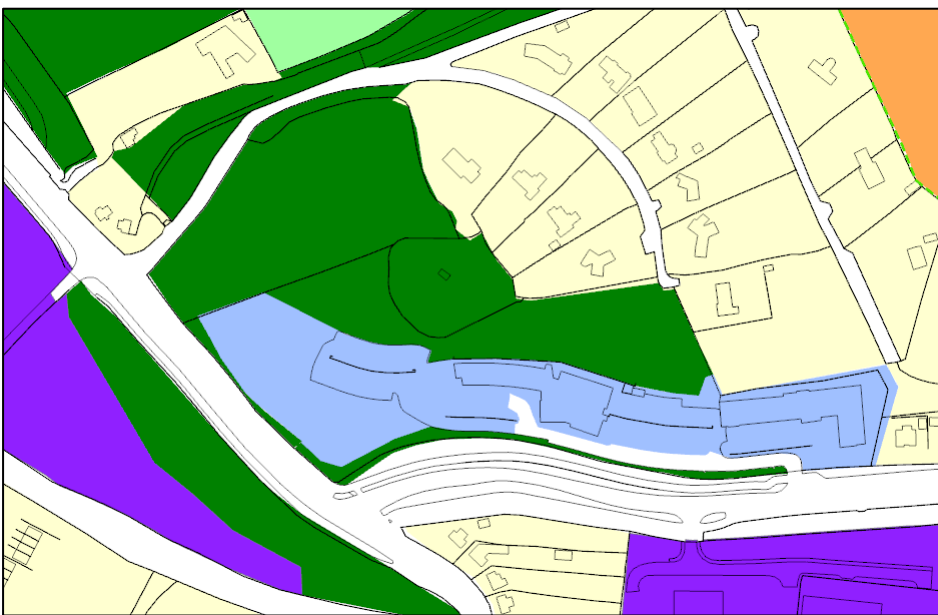
With respect to the request to change part of the lands from OS1 to CE, having regard to the existing community uses adjacent this is considered a reasonable proposal to consider changing part of the lands from OS1 to CE subject to (a) all mature trees on the lands being retained and protected and (b) a public amenity park area being provided as part of any development, that allows for public access to the trees

With respect to the request for a change from OS1 to RN1, the CE does not support this request; the lands that are proposed for residential zoning appear abundant in vegetation and natural biodiversity and therefore it is considered it would undermine the nature protection objectives of the County Development Plan and this LAP to consider allowing residential development which would clearly require significant site clearance.

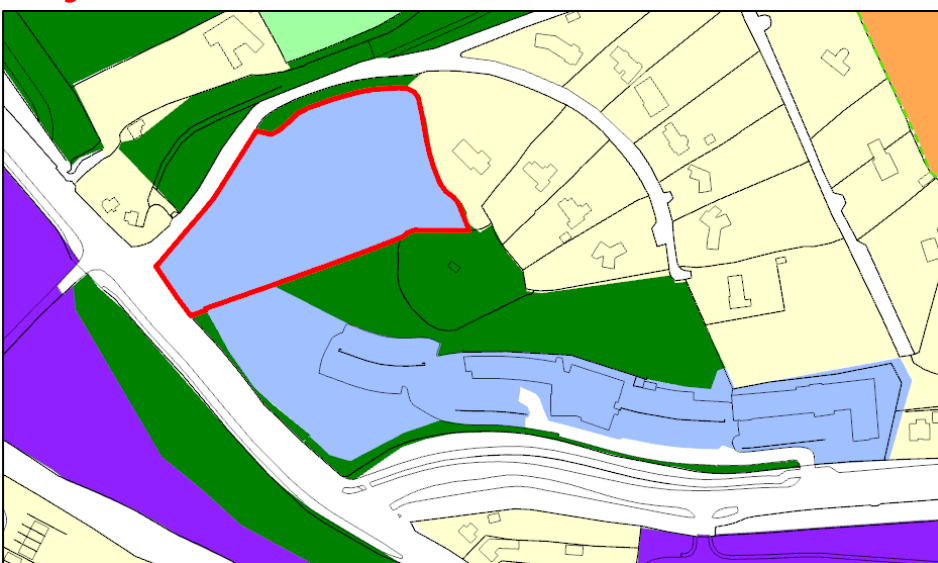
Chief Executive’s Recommendation

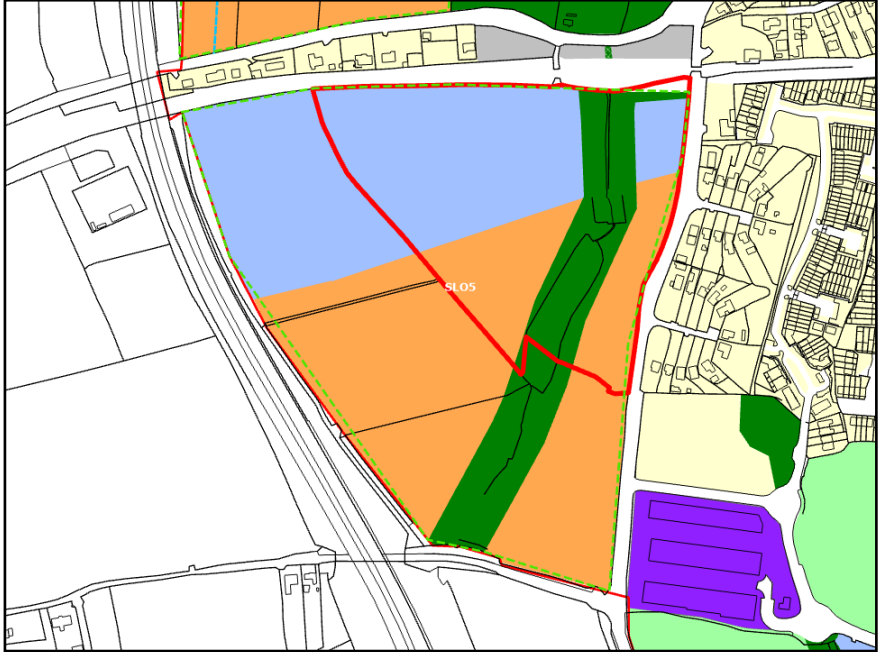
Amend zoning of lands from ‘OS1 – Open Space’ to ‘CE – Community & Education’ as illustrated below:

Change from:

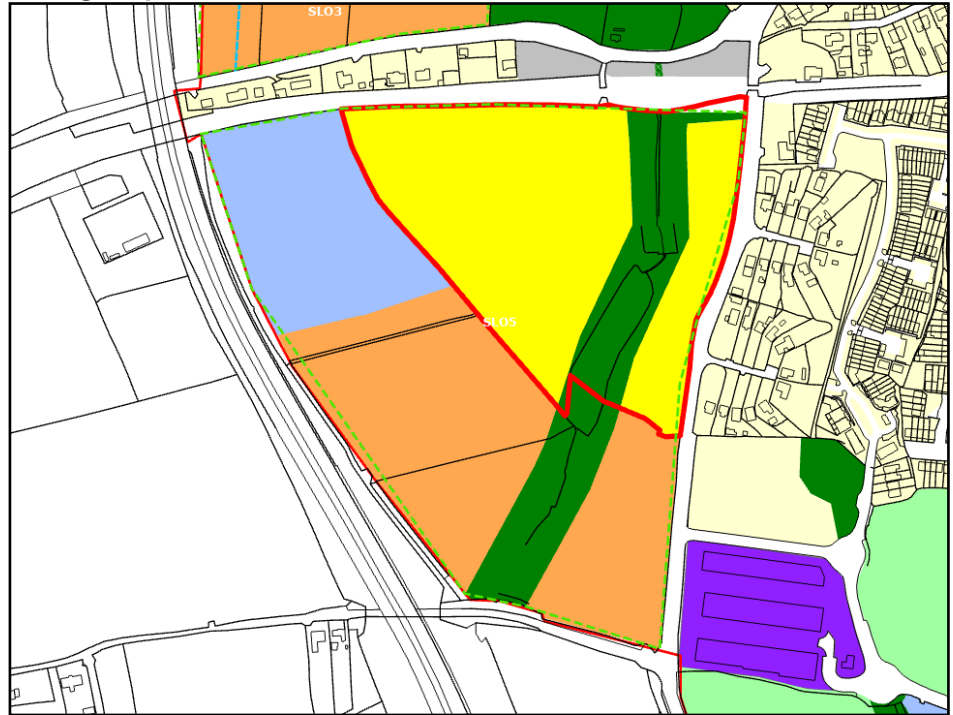


Change to:



No.	Name	Issues Raised
15	Eugene Stephens By Post	<p>It is requested that c. 8.6ha of land at Ballybeg, Rathnew zoned CE 'Community Education', RN2 'New Residential Priority 2' and OS1 'Open Space' Areas' in the Draft LAP be zoned RN1 'New Residential Priority 1' and Open Space as per the previous Wicklow LAP. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The lands are located on western edge of the local area boundary and would therefore not be suitable for any school or community facility as the lands are located more than 15 minute walk time from existing village facilities or educational buildings. ▪ The land is serviceable due to the main sewer and watermain availability on Ballinabarney Hill and the good road and public transport network servicing the land. ▪ The 25m green strip either side of the stream appears slightly excessive. ▪ The development of this land for residential will serve the area with easy access due to its proximity to the nearby exist/off the M11 Motorway. ▪ Housing development at this area will also allow pedestrian access through the existing single underpass of the railway line, to the proposed land zoned Public Utility to the north of the site and railway line which is earmarked for railway platform. This will make easy access to the Dublin Wexford train and ideal location for regular commuters to Dublin for work. ▪ There is no direct access to residential development showing on the concept plan. ▪ There appears to be ample land zoned community/ education at locations which are more easily accessed by the general public within the LAP area particularly the massive area occupied by the county campus, which will cater for community/ education needs into the lifespan of this LAP. <p>Draft Zoning:</p> 

Zoning Request:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with the NPF, Ministerial Guidelines (including the 'Development Plans – Guidelines for Planning Authorities' (2022), RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy. In these regards, the request for the zoning of additional land for residential use as detailed in this submission would exceed Core Strategy requirements and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

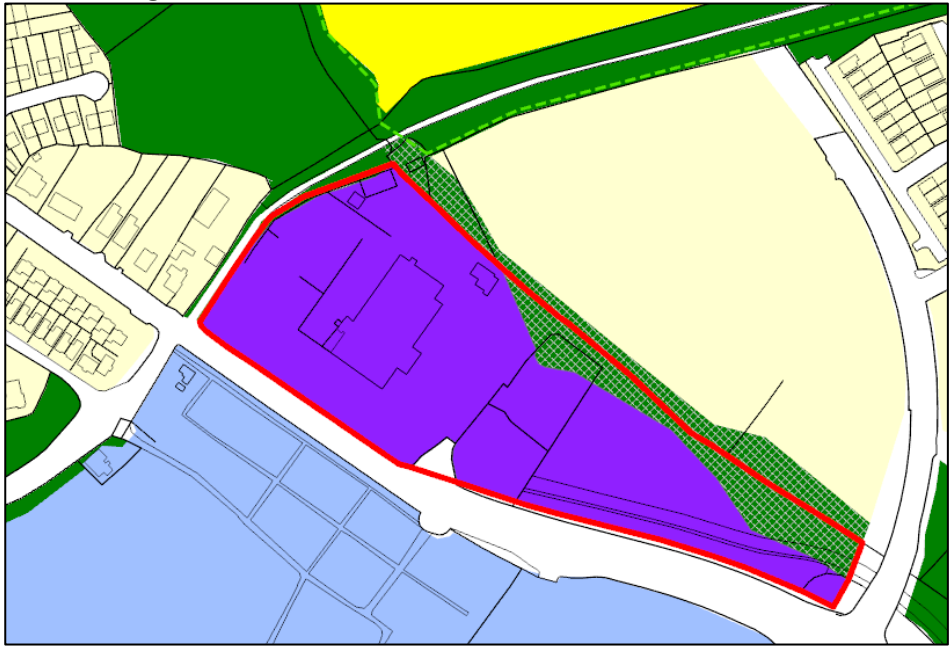
The proposed change in zoning requested in this submission would result in a reduction in CE 'Community & Education' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

In particular, these lands have been identified as optimally located for the development of a future secondary school in the Rathnew area, following detailed assessment set on the Local Transportation Study and the Social Infrastructure Audit that accompany the plan. These clearly identified that nearly all residential area in Rathnew village and lands surrounding same to the north are not within walking distance of a secondary school. A school at this location would result in nearly all residential areas in the northern part of the plan being within walking distance. This site is also optimal having regard to its location on regional roads connecting to locations within and surrounding the settlement.

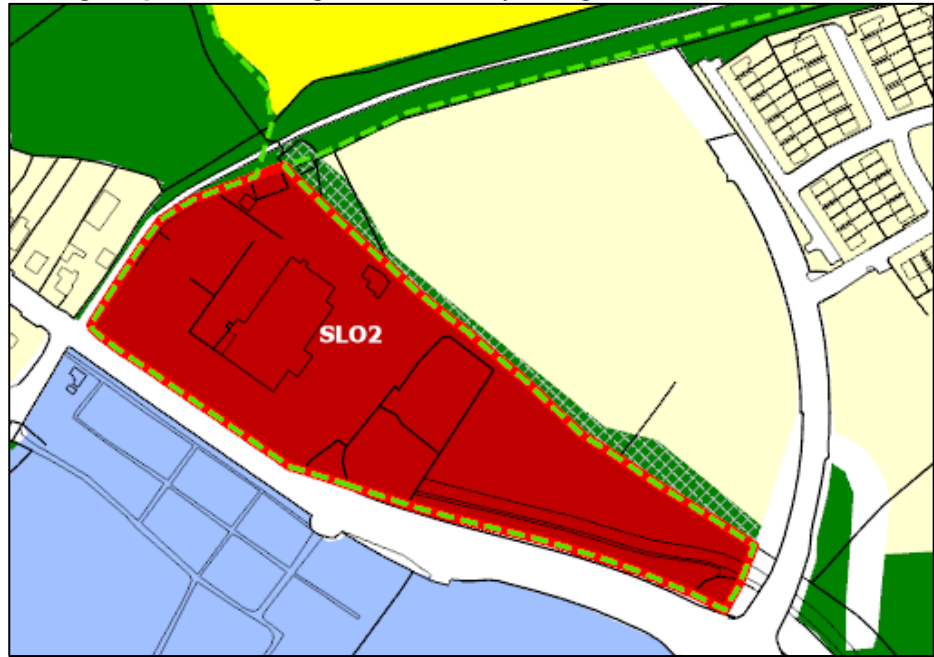
With respect to the green corridor along the watercourse, this has been carefully identified to ensure protection of the watercourse and trees and compliance with County Development Plan objectives. The concept plan is purely indicative and does not purport to identify or fix possible access points into the lands. The CE is satisfied that all lands zonings shown in the draft LAP could be accessed and would be of adequate size / width to support development, even with the central green corridor reserved.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
16	Stafford Family Partnership Ref 152725	<p>It is requested that c. 3.8ha of land at Merrymeeting zoned E 'Employment' and OS in the Draft LAP be zoned MU 'Mixed Use' and optionally brought within the boundary of SLO2.</p> <p>It is unclear if the lands zoned OS are directly requested to be rezoned as this is not explicitly stated, however the submitted site boundary (Fig. 1) would include the OS lands. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The site is no longer in active uses and expressions of interest have not been forthcoming. ▪ There is a need for housing in the Wicklow-Rathnew area. ▪ That the E 'Employment' zoning of the lands is unrealistic and unachievable within the lifetime of the LAP/CDP due to its location and historic vacancy, with reference made to the Development [Plan] Guidelines 2022 – including in terms of employment zonings having a credible rationale and the 'SMART' approach to development plan objectives. ▪ That the E 'Employment' zoning of the lands is not realistic in relation to Section 2.3.2 of the Wicklow County Development Plan 2022-2028 – in terms of the CDP's function in supporting the specific and achievable goals of the LECP and economic development generally. ▪ That the Draft LAP written statement states that objectives should be achievable, and may make specific reference to the site as a brownfield opportunity site. ▪ The submission includes a report from Lavelle Commercial Property stating that it is very difficult to see the subject site being developed for employment purposes on a viable basis during the life of the draft plan arising from a variety of factors including demand, construction cost and adjacent residential areas. <p>Draft Zoning:</p> 

Zoning Request (including SLO2 boundary change):



Chief Executive Response

The zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The zoning of brownfield opportunity sites for land uses other than residential, including the zoning of land for employment purposes, would be consistent with the strategy of providing for a mixture of uses and the efficient use of land to reduce the need to travel.

The proposed change in zoning requested in this submission would result in a reduction in employment zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has similarly been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

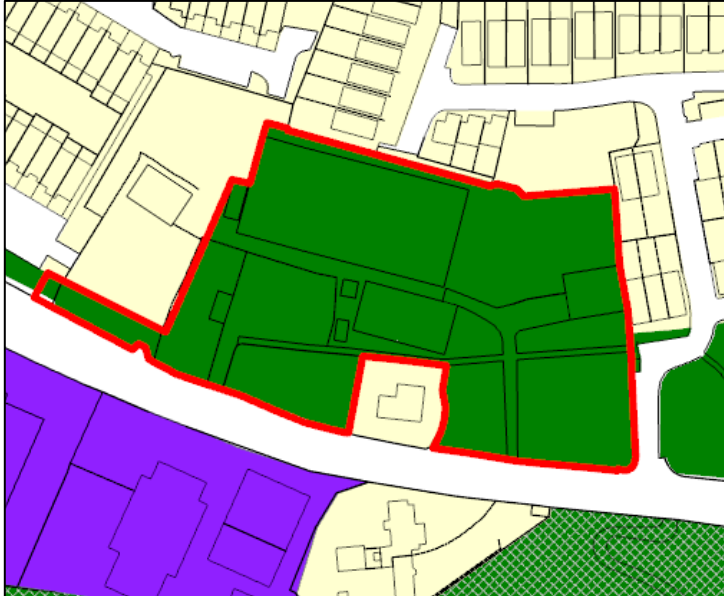
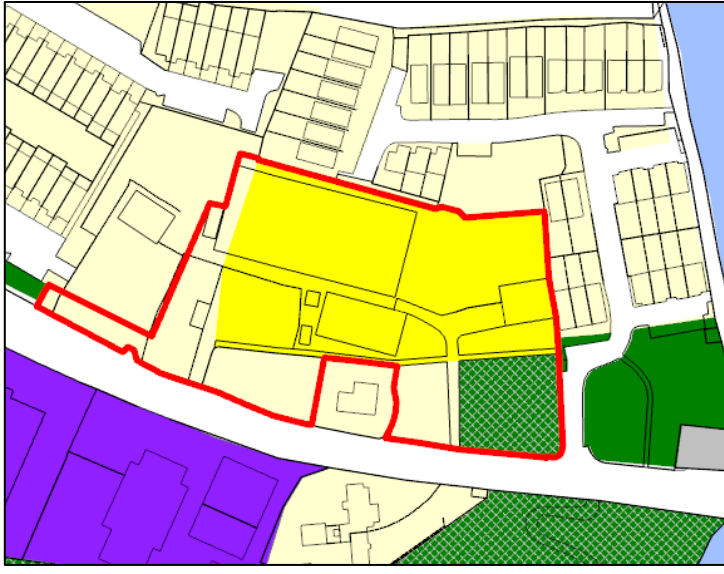
Finally, the OS zoning provisions are justified in order to address areas on the landholding that are identified as at risk of flooding.

These lands are not needed to achieve the objectives of SLO2 therefore, any change to the boundary of SLO2 is considered warranted.

Therefore the CE does not recommend the zoning of these lands for MU 'Mixed Use' or residential development. On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
19	<p>Woodroofe Family & William Parle Ref 095152</p>	<p>It is requested that lands of c. 1.03ha in Bollarney North zoned OS1 'Open Space' in the Draft LAP be zoned RN1 'New Residential - Priority 1', RE 'Existing Residential', and OS2 'Natural Areas' [Note that the submission refers to POS 'Passive Open Space', which in the draft LAP is now referred to as OS2 'Natural Areas']. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The residential (or part residential) zoning of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019 and the Wicklow Town Development Plan 2007 ▪ The location of the subject lands surrounded by residential development, with walking distance of a train station, community facilities, and town centre facilities. ▪ The servicing status of the lands as 'Tier 1 Serviced Zoned Land' <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

The key basis for the change in zoning of these lands from part OS - part residential from the previous plan was additional assessment of risk of flooding, which shows slightly more extensive risk of flooding compared to the previous assessment pre 2013 which was based on less accurate data, as well the County Development Plan objective to maintain a 25m riparian corridor along watercourses.

There are also some areas within this parcel that are not identified as at risk of flooding presently, but have been identified by the OPW as being at risk in future scenarios.

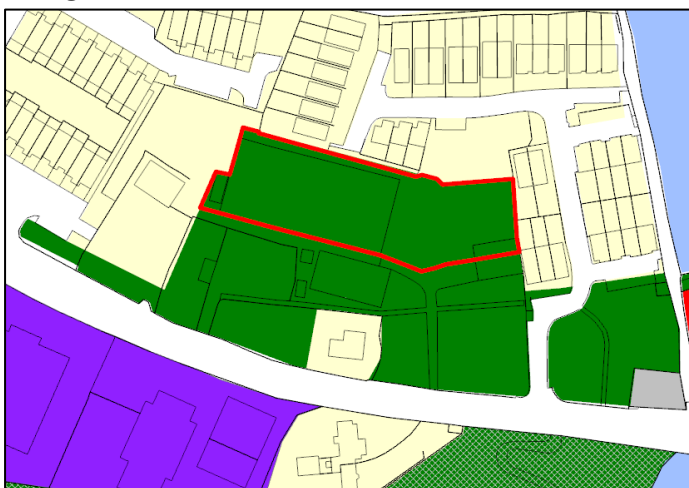
Therefore it is considered that part of the lands may be considered for a zoning change. Given the small, infill nature of these lands in the built up part of the settlement, it is not considered that a breach of the Core Strategy would arise from a small quantum of residential zoning at this location.

The remaining OS would still cross the entire roadside frontage of the lands where a watercourse and flood risk is present, and development of any residential lands to the north would require carefully calibrated solution to cross the flood risk zone without impeding water flows or resulting in flooding elsewhere.

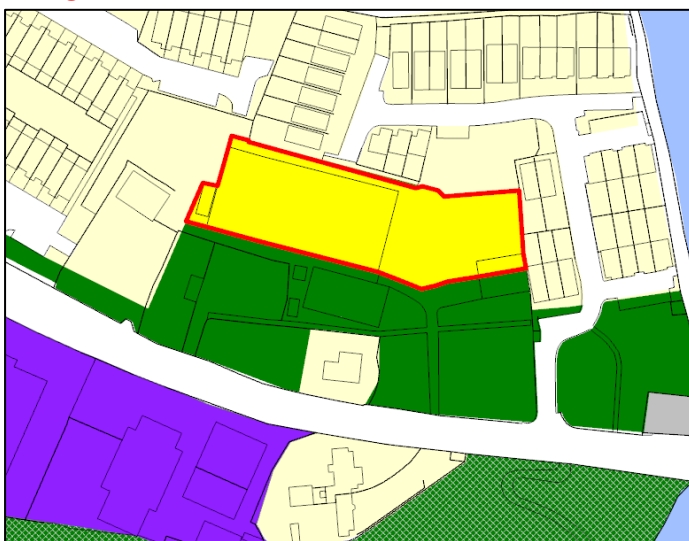
Chief Executive's Recommendation

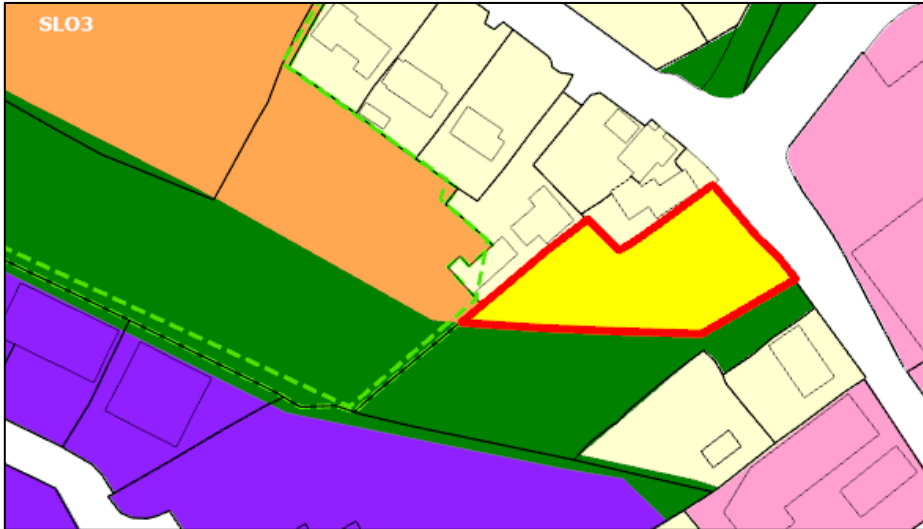

Amend zoning of lands from 'OS1 - Open Space' to 'RN1 - New Residential' as illustrated below:

Change from:



Change to:



No.	Name	Issues Raised
21	Siofra Quigley Ref 104402	<p>It is requested that lands of c. 0.2ha at Milltown North zoned RN1 'New Residential – Priority 1' in the Draft LAP be zoned OS1 'Open Space'. In support of this rezoning, the following grounds are put forward:</p> <p>The area is adjacent to lands zoned as a green link between the N11 and Tinakilly.</p> <p>The biodiversity value of the lands as a naturally regenerating immature woodland with scrub understory, with a range of wild species observed utilising the site as a natural corridor, in the context of a climate and biodiversity crisis.</p> <p>That it is a small constrained site that may be difficult to access at the traffic lights on the R772.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022) <p>The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with</p>		

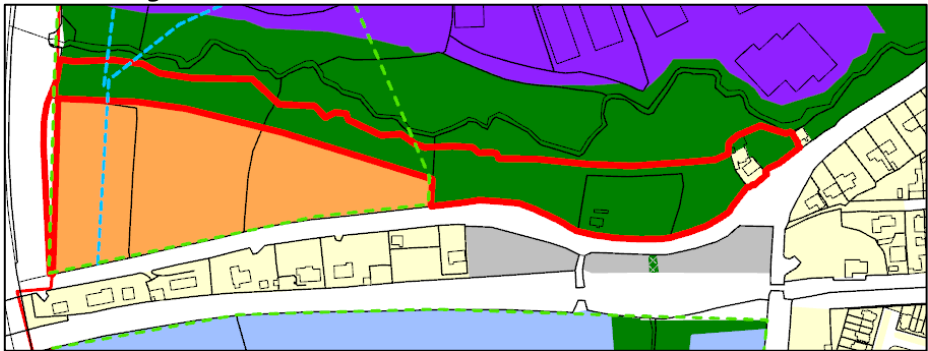
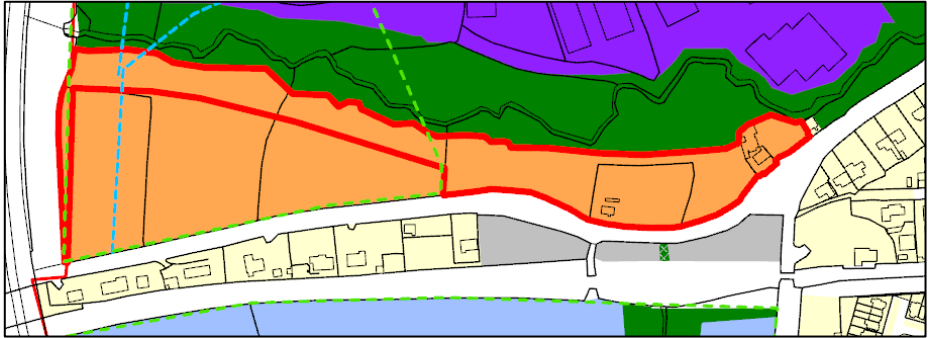
undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, these lands are considered suitable for residential development, being located in the core of Rathnew Village. It should be noted that under the previous plan, most of the lands now proposed to be zoned OS adjoining the RN1 lands to the west were also zoned for new residential development; having given careful consideration to the biodiversity of the area, including along the watercourse which separates these lands from the employment lands to the west, more than 50% of this parcel has now been proposed to be changed to OS. Therefore it is very evident that nature and biodiversity considerations have been fully integrated into the zoning strategy for this small area.

Therefore the CE does not recommend the zoning of these lands for OS1 'Open Space' development.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
38	Mary Byrne, Liz Byrne, Carmel Whelan Ref 131457	<p>A range of issues and requests are set out in this submission; the assessment below addresses the request for changes in zoning.</p> <p>This submission also raises issues with respect to the Tighe's Avenue to R752 link road objective, which are addressed in Chapter 9, Topic 2: Transportation of this report; and with respect to flood risk and OS2 zoning interpretation, which are addressed in Section 6 of this report. .</p> <p>It is requested that c. 2.12ha of lands at Ballybeg, zoned OS1, be zoned for residential use. In support of this rezoning, the following grounds are set out:</p> <ul style="list-style-type: none"> ▪ The residential zoning of part of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019 [A request to reinstate the residential zoning of these lands only, of c. 0.33ha, is also stated separately]. ▪ The lack of justification for the removal of zoning in the Draft LAP. ▪ New or better flood information shows a significantly reduced zone A and B on the lands. ▪ The 2013 plan process zoned land in flood zones for residential use on the basis of a submitted site specific flood risk assessment. <p>Draft Zoning:</p>  <p>Zoning Request:</p>  <p>[Issues in relation to phasing were not raised, therefore the above mapping assumes the requested zoning as RN2 'New Residential – Priority 2' in line with the adjacent lands]</p>

Chief Executive Response

Under the previous development plan, these lands were zone part residential / part OS. This submission is seeking not only to re-instate of some lands that have been proposed to change from R to OS but also that lands that were zoned in the previous development plan as OS should now be zoned for R use. The key basis for the change in zoning, which has resulted in a very small reduction in the residential element

(from 2.65ha to 2.33ha) and extension of the OS zoning, was additional assessment of risk of flooding, which shows more extensive risk of flooding compared to the previous assessment pre 2013 which was based on less accurate data, as well as the application of the new provisions of the 2022 County Development Plan which now requires the maintenance of a 25m riparian corridor along watercourses. There are also some areas within this parcel that are not identified as at risk of flooding presently, but have been identified by the OPW as being at risk in future scenarios.

The CE is satisfied in these regards that the OS zoning is fully justified and necessary in order to ensure no risk of flooding would arise for occupants of any future homes and to ensure maximum protection of nature and biodiversity.

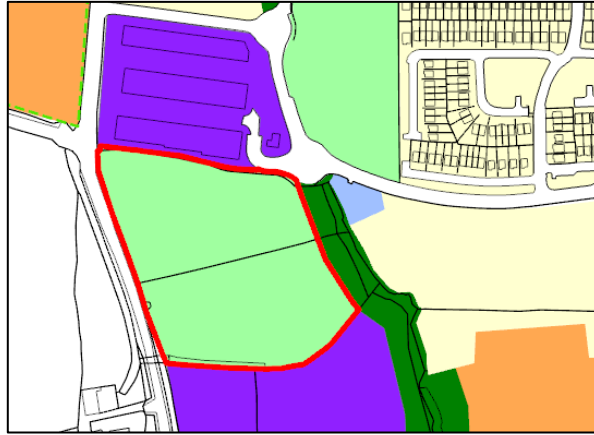
On foot of this therefore submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

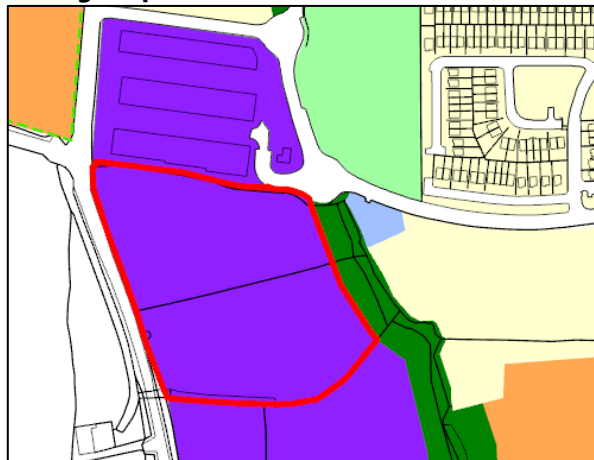
No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
40	Cyril McGuire of VC Land Investments Limited Ref 143107	<p>It is requested that lands of c. 4.1ha at Broomhall zoned AOS 'Active Open Space' in the Draft LAP be zoned E2 'Enterprise & Employment' or be zoned for residential development (Note: it is not requested to rezone lands within the subject site zoned OS1 'Open Space' in the Draft LAP).</p> <p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The track record of the landowner in developing largescale commercial developments. ▪ That no other pre-draft submissions identified this site as being suitable for active open space. ▪ The pattern of land use zoning in the surrounding area and the site's accessibility to the national road network. ▪ The planning history of the site, which includes permissions for largescale commercial development ▪ The zoning of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ The incorrect exclusion of Wicklow Golf Club in the calculation of existing active open space on the basis that it is for fee-paying members only, as its website states that 'pay as you go' use is possible, and other fee paying clubs exist within the plan area; the lack of stated area for Wicklow Town Beaches in the accompanying Social Infrastructure Audit; the exclusion of Marlton Equestrian Centre in calculating existing active open space; the exclusion of open space within housing developments in calculating active open space, e.g. Brookfield Park. ▪ That there is 75.6ha of existing and undeveloped of active open space, 8.8ha greater than the 66.8ha required as per the accompanying Social Infrastructure Audit. ▪ That the accompanying Social Infrastructure Audit did not account for existing and planned active open space within the catchment area but outside the LAP boundary, e.g. Ashford GAA club, permitted Glenealy GAA club. ▪ That the area of active open space under development under WCC Reg. Ref. 22/837 is 8.8ha, which exceeds the 2.45ha stated in the accompanying Social Infrastructure Audit. ▪ That land previously zoned AOS 'active open space' which have been rezoned 'Open Space' in the Draft LAP have not been reflected in the calculation of active open space. ▪ That the calculation of active open space has not had regard to the future provision of active open space as part of a new education facility within the SLO5 area. ▪ That the subject lands are one of the best served in the LAP with regard to open space, with a lack of active open space in the north of Rathnew. ▪ That there are 121.09ha of land zoned OS1 'Open Space' and 117.48ha of land zoned OS2 'Natural Areas', to a total of 324.32ha of AOS/OS1/OS2 in the Draft LAP. ▪ That the subject site is an outlier in lacking a clear rationale for identification as active open space.

Draft Zoning:

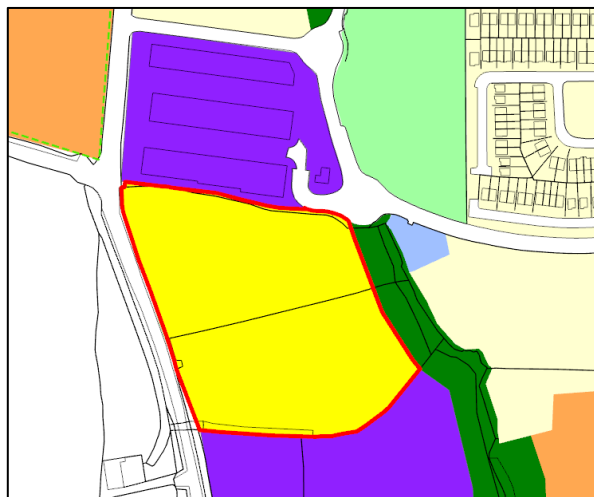


Zoning Request:



[It is noted that the submission requests E2 'Enterprise & Employment' zoning, the above mapping shows the requested zoning as the amalgamated E 'Employment' zoning as provided for in the Draft LAP.]

Or



[Noting that the submission requests 'residential' zoning without reference to phasing, the above mapping shows the requested zoning as RN1 'New Residential - Priority 1'. The CE response will respond to this request on the basis of the subject lands being zoned either RN1 'New Residential - Priority 1' or RN2 'New Residential - Priority 2'.

Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use (RN1 'New Residential – Priority 1 or RN2 'New Residential – Priority 2') as detailed in this submission would:

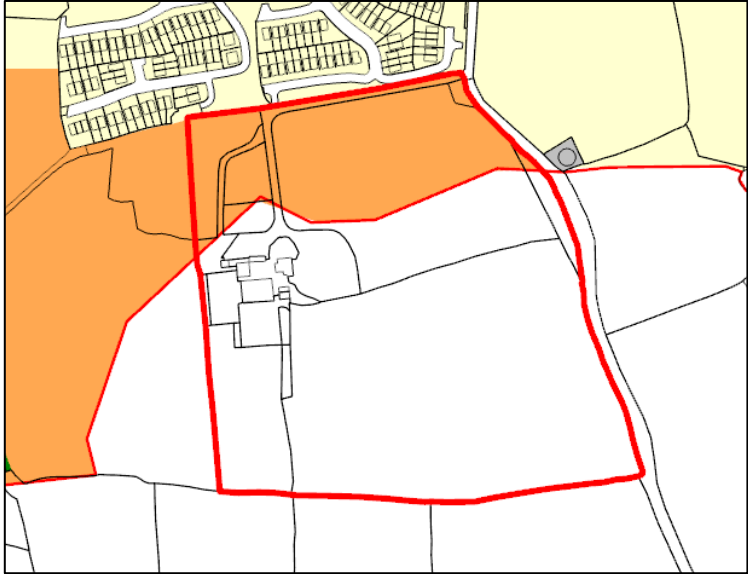
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended);
- Result in the excessive spatial expansion of the settlement and would comprise an unsustainable and unacceptable development location for new residential development, would be inconsistent with sequential development patterns, with Town Centre First principles, proximity to services and facilities, and the need to reduce carbon emissions.

The CE is satisfied that these lands are highly suitable for AOS development, having regard to their location vis-a-vis existing sports club and residential areas surrounding. In addition, the CE is satisfied that more than adequate provision has been made in the draft plan for new employment development, including in this immediate area, and therefore does not support the request to change from AOS to 'E'.

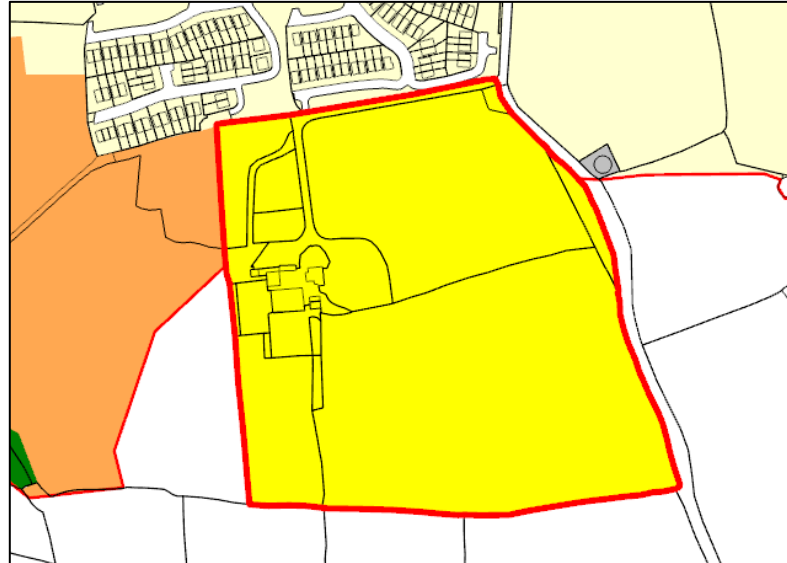
On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
43	Durkan Group Ref 164446	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which is also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that c. 11.3ha of lands at Broomhall, partially zoned RN2 'New Residential – Priority 2' and partially outside of the settlement boundary with no specific land use zoning, be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Insufficient RN1 lands have been zoned to deliver the housing target for the settlement given the achievable densities compared with the implied densities of 48.6 dph (gross) and 57.2 dph (net). ▪ The subject lands are fourth best of 25 No. sites in relation to proximity to town/village centres and a range of services/amenities. The subject lands scored better in this regard than 21.5ha proposed to be zoned RN1 'New Residential – Priority 1', with sites between the centres between Wicklow town and Rathnew being more likely to be closer to services. ▪ The development of the subject lands would represent coherent and integrated infill development, towards the formal amalgamation of Wicklow Town and Rathnew Village, as opposed to the blanket continuance of radiating outwards from the 2 No. centres in a 'dumbbell' like shape. Flood risk and existing/emerging development constrain such infill in the north-east of the plan area, whereas the subject lands would be classified as 'Tier 1'. ▪ The local activity and intention for delivery by Durkan Group. ▪ Key water services and road infrastructure are being delivered to the boundary of the site, including 'distributor grade' road infrastructure. <p>Draft Zoning:</p> 

Zoning Request (incl. settlement boundary change):



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

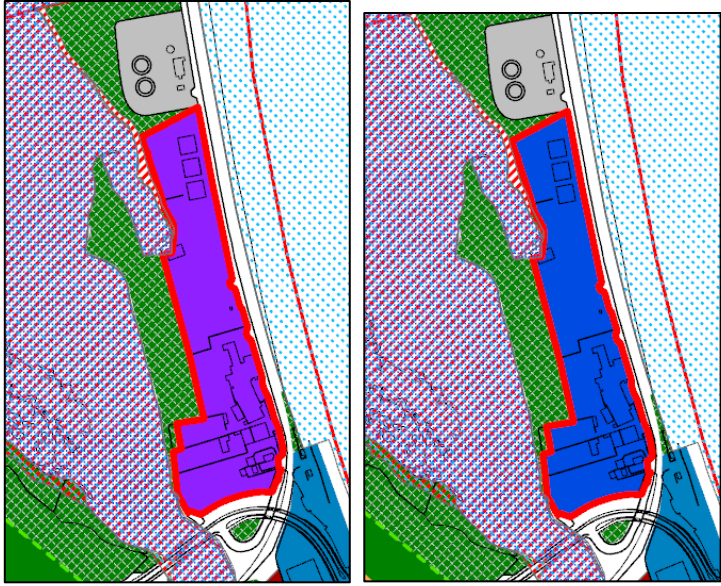
In these regards, the request for the zoning of additional land for residential use, and the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would

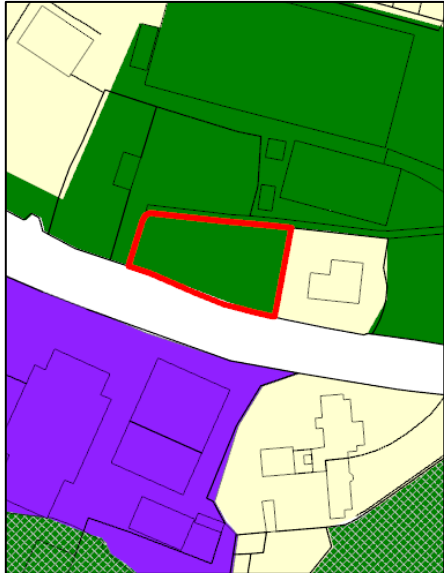
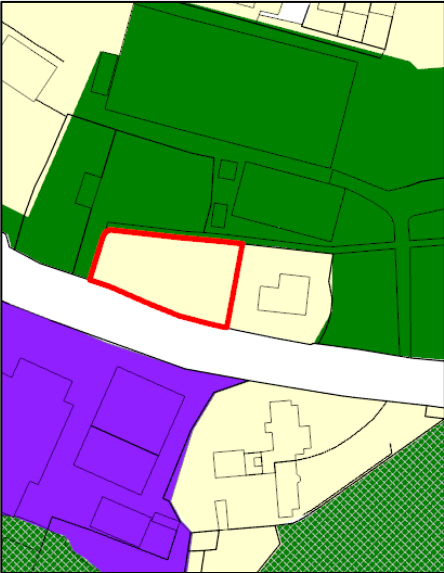
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Exceed the 80m contour in this area, which has been established in the previous plan and continued in this draft plan as the upper limit for new development having regard to visual amenity and servicing considerations. Having regard to the availability of significant lands in and surrounding the settlement at less sensitive and more easily serviced lower elevations, these lands are not considered an optimal location for the expansion of the settlement.

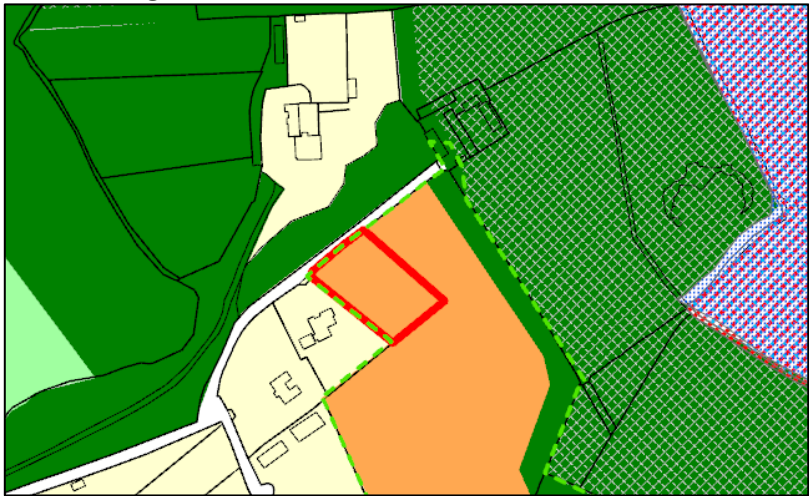
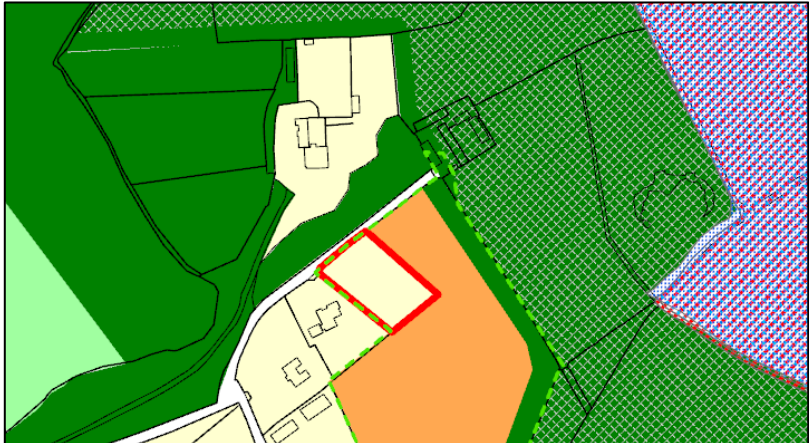
Therefore, the CE does not recommend the zoning of these lands for residential development.

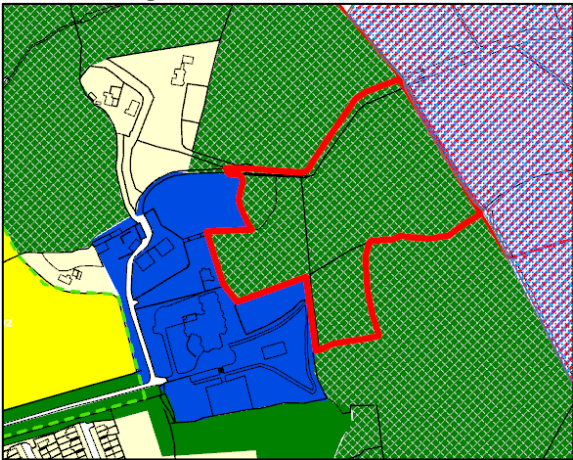
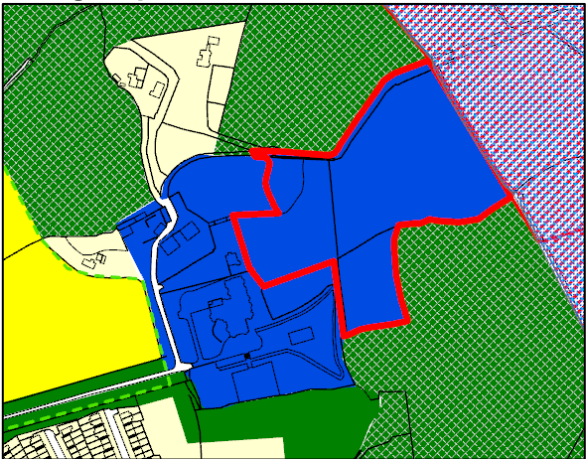
Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
	<p>Susan Gavin Ref 171625</p>	<p>Requested that lands of c. 8.3ha at Bollarney Murrough/Corporation Murrough, zoned E 'Employment', be zoned T 'Tourism'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ It is one of the most beautiful areas in the whole county, possibly East Coast. ▪ Area of employment is unsightly ▪ Businesses could be relocated to a more suitable site and this area re naturalised or used for tourism as an amenity for locals and visitors alike. <p>Draft Zoning: Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>While the points raised in this submission are noted, the lands in question are already developed for employment use and therefore it would not be logical to amend the zoning as suggested. However, it should be noted that in light of the sensitivities of the area, the draft LAP has (a) reduced the extent of the employment zoning in the area and (b) set out development objectives to manage further development in the area as follows:</p> <p><i>On lands zoned for employment on the 'Murrough North', it is the objective of the Council to:</i></p> <ul style="list-style-type: none"> ▪ <i>To facilitate the continued operation of established / permitted existing business / commercial activities subject to ensuring they operate in a manner which is respectful of the local environment, use environmentally friendly / innovative technologies and improve the visual amenity of the area;</i> ▪ <i>To resist further expansion / intensification of the existing industries / businesses and consideration will only be given to development that enhances nature conservation;</i> ▪ <i>To ensure that no development is permitted which would give rise to significant adverse impacts upon the conservation objectives of European sites.</i> ▪ <i>To encourage site operators to improve the overall visual amenity of the area including the provision of additional landscaping using native species appropriate to this natural coastal setting.</i> <p><i>While the Council acknowledges that these industries are established, permitted and operating businesses / commercial activities, it is important to have regard to (a) the need to ensure no significant adverse impacts on the European Sites arise from the intensification or change of use of this area for industry / employment and (b) the nature restoration goals of the Council and (c) the available of significant areas of zoned employment land within the settlement away from the coast and other environmentally sensitive locations.</i></p>		
<p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

No.	Name	Issues Raised
50	William Parle Ref 082014	<p>It is requested that land of c. 0.15ha at Bollarney North, zoned OS1, be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The planning history of the site, with 4 No. units permitted under Ref. 16/1149. ▪ The servicing of the site by sewers, watermains, footpaths and sufficient sightlines. ▪ That a full flood report will accompany any future planning application as the lands are partially in flood zone A. <div style="display: flex; justify-content: space-around;"> <div data-bbox="501 622 946 1227"> <p>Draft Zoning:</p>  </div> <div data-bbox="959 622 1404 1227"> <p>Zoning Request:</p>  </div> </div>
Chief Executive Response		
<p>The lands in question are zoned for OS use having regard to the flood risk identified on the lands. As part of the development plan making process, in accordance with the Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009), it is necessary to carry out Strategic Flood Risk Assessment of the plan provisions, including zoning, and only zone lands that are free from flood risk or pass the plan-making 'Justification Test'.</p> <p>These lands do not fulfil these criteria, would not pass the plan-making Justification test for residential zoning; it is not possible to zone the land for residential development on the basis that a site specific flood risk report can be submitted at planning application stage.</p> <p>Therefore, the CE does not recommend the zoning of these lands for residential development.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

No.	Name	Issues Raised
52	David O'Rorke Ref 093521	<p>It is requested that c. 0.28ha of land at Knockrobin, zoned RN2 'New Residential – Priority 2', be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Permission previously granted Ref. 16/552 for a 3-bedroom family dwelling with a garage. ▪ The inability to return from Australia in late 2019 to enact the permission due to COVID-19, and the intention to return in the coming months. ▪ The intention to submit a new planning application on the lands. ▪ The legal ownership of the lands corresponding to the zoning request, and the ownership by family of the surrounding Knockrobin Farm. The subject lands are accessed by a right of way. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>The zoning of the subject lands as RE 'Existing Residential' would not be consistent with the objective of that zoning, in that no existing residences are present on the subject lands. The draft RN2 'New Residential – Priority 2' zoning allows for residential development in line with all prevailing development objectives and standards.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

No.	Name	Issues Raised
54	Mezen Consultancy Services Ltd. Ref 100103	<p>It is requested that lands of c. 5.1ha at Knockrobin, zoned OS2, be zoned T 'Tourism'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ There is an existing glamping facility of c. 0.97ha partially within and adjacent to OS2 lands, as permitted under Refs. 19/208, 24/60333, 24/60345, which has been a great success. ▪ There is a concern that the proposed zoning of lands as OS2 'Natural Area' will have an adverse and detrimental restriction to the potential to further expand the business. ▪ There is considerable potential for expansion, including the development of walkways and other outdoor amenities which would enhance the existing development. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and

Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

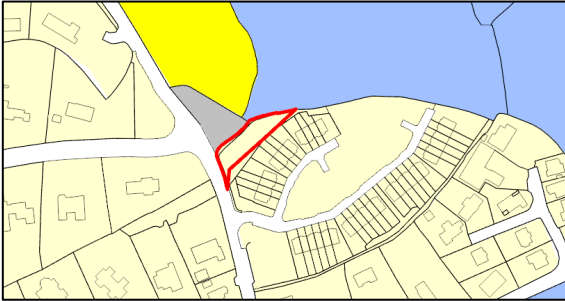
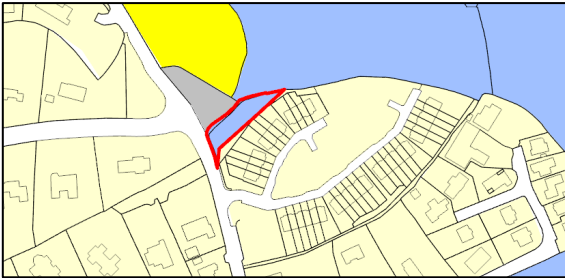
The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
58	Wicklow Town & District Chamber of Commerce Ref 120652	<p>It is requested that c. 1ha of lands at Bollarney Murrough, zoned OS2 'Natural Area', be zoned E 'Employment'. This submission does not map the lands but rather supports Submission No. 67 in their request. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The land is essential to the operation of R.F. Conway & Conway Limited, one of Wicklow Town's prominent employers and the largest imported timber terminal in the state. ▪ The terminal is key to enabling the Government's housing targets and is at capacity. ▪ This zoning issue could be a key focal point of negative local and national headlines, would negatively affect Wicklow's local economy, and would impact the long term sustainability of Wicklow Port. ▪ The rezoning of c. 1ha would reflect a cooperative approach to achieving both economic and environmental objectives.
Chief Executive Response		
<p>The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.</p> <p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.</p> <p>The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.</p> <p>The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

No.	Name	Issues Raised
62	Dominican Convent Wicklow Ref 125947	<p>It is requested that lands of c. 0.08ha at Corporation Lands, zoned RE 'Existing Residential', be zoned CE 'Community & Education'. In support of this rezoning, it is put forward that It is not wished that this area is zoned for residential use as it forms the access to the community farmlands, zoned CE 'Community & Education', adjoining this area.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

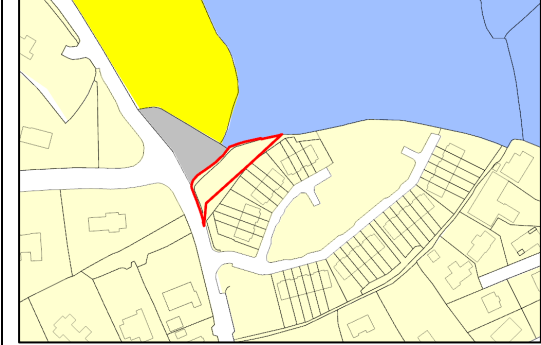
Chief Executive Response

The requested zoning amendment is considered acceptable and does not give rise to adverse impacts.

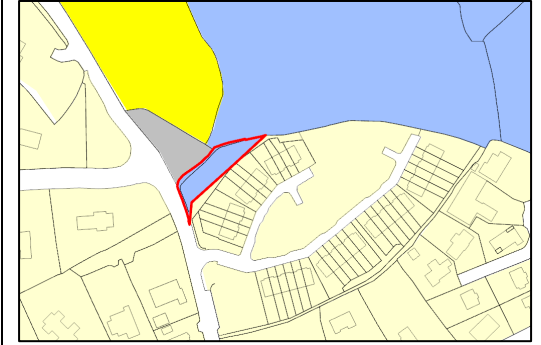
Chief Executive's Recommendation

Amend land-use zoning map as follows:

Change from:



Change to:

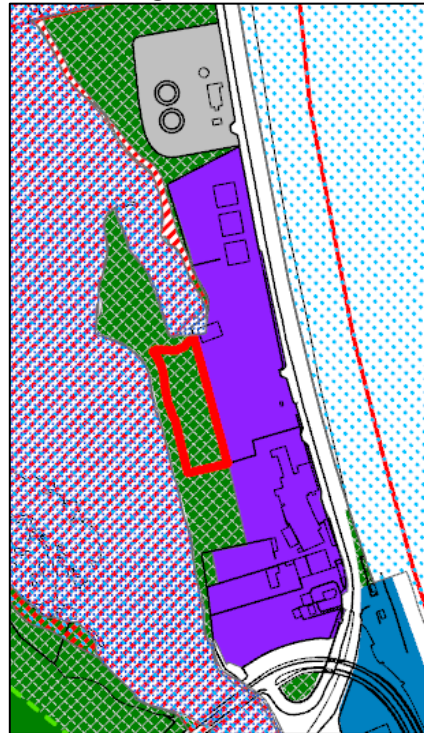


No.	Name	Issues Raised
67	R.F. Conway & Company Ltd. Ref 142720	<p>It is requested that c. 1ha of lands at Bollarney Murrough, zoned OS2 'Natural Areas', be zoned E 'Employment'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ R.F. Conway & Company Ltd. is multi-generational highly reputable shipping and logistics enterprise based in Wicklow Town, directly employing 20 individuals and supports hundreds of additional jobs across the nation while contributing directly to Ireland's national objectives for addressing housing needs. ▪ Wicklow Port was designated a Port of Regional Significance, as recognised in the Wicklow County Development Plan 2022-2028, with the port managed by Wicklow County Council. ▪ Engaging local businesses and stakeholders should be a priority in the local area plan process. ▪ The lands are strategically located with access to the port access road, delivered by Wicklow County Council, and Wicklow Port. ▪ Previous objectives in the Wicklow Town-Rathnew Development Plan 2013-2019 had the objective: <i>'Facilitate the continued operation of established / permitted existing business / commercial activities and the development of new employment facilities in this area'</i>. ▪ A single shipment of imported timber nearly fills the port to capacity. The existing storage facilities prevent congestion by transporting cargo out of the port before the next vessel arrives, with logistics not easily replicated at other ports. R.F. Conway & Company is completely reliant on maintaining and enhancing operations north of the Port Access Road bridge, and the OS2 'Natural Areas' zoning of the lands has not adequately considered the significant impacts on the viability of business operations the viability of Wicklow Port. ▪ Housing targets in 'Housing for All', the promotion of Modern Methods of Construction (MMC), and the increasing role of 'offsite manufacture' in housing delivery require sawn packaged timber. Large storage facilities allow a 'just-in-time' model for procuring timber. Retaining employment zoning on the subject lands will facilitate increased volumes of packaged timber products imported through Wicklow Port and contribute to addressing the national housing crisis. ▪ The sewage treatment plan establishes a clear boundary to the Special Area of Conservation. A balanced approach is sought that aligns environmental protection with sustainable business operations. The existing landscape is brownfield scrub vegetation, with a chemical works and the Dublin and Wicklow Manure Company factory having been in use on the lands for multiple decades. Retaining the employment zoning will not result in any direct loss or alteration of the existing SAC habitat. Environmental sensitivity mapping in the SEA Environmental Report shows the subject lands in light green/blue, the lowest level of sensitivity. ▪ The zoning of c. 1ha for E 'Employment' uses would result in: 1.8ha of previous employment land being zoned OS2 'Natural Area' (along with the entire peninsula area); a 20m buffer zone along the Broadlough; additional mitigation proposed by the business (landscaping, berming, perimeter fencing, advanced lighting solutions). ▪ Risks: impacts on commercial viability, growth, future investment, job losses, and revenue. ▪ Advantages: Proven results of business operator, future rail opportunities,

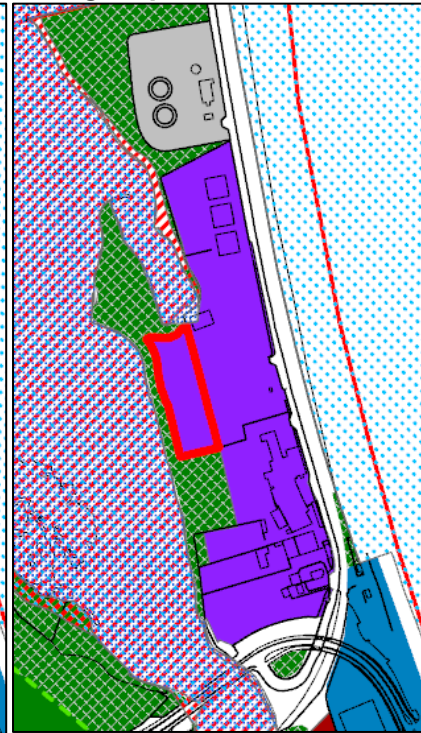
Irish forestry interests.

- The submission includes a report from Environmental & Efficiency Consultants (Ireland) Ltd., which states that the subject lands have the lowest environmental sensitivity, that a storage area includes no major developments of the lands that would be likely to impact environmental objectives, is not within an SAC/SPA/pNHA or likely to contain Annex I habitats, and refers to EIA screening assessment and Natura Impact Statement for a neighbouring waste facility in 2019, which was found to not adversely impact European sites by a planning inspector.

Draft Zoning:



Zoning Request:



Chief Executive Response

The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

It is noted that as of December 2024, there is a live application for the development of these lands (on time extension following recommendation for refusal). This application is recommended for refusal for the following reasons:

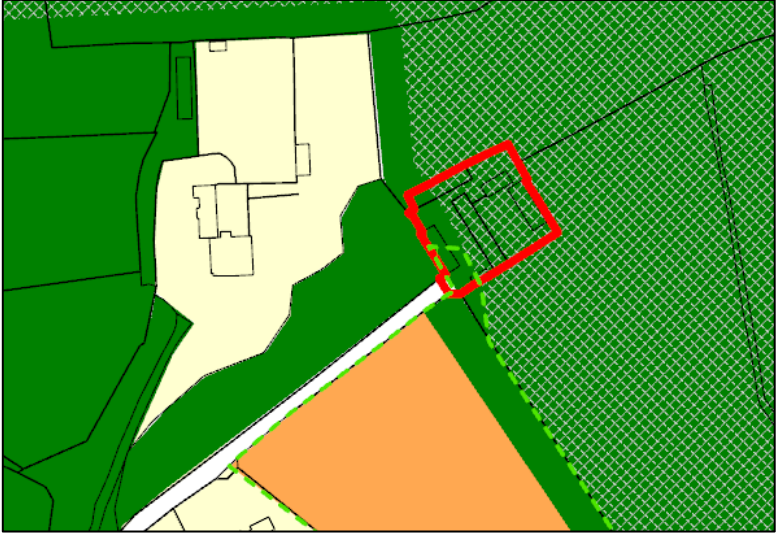
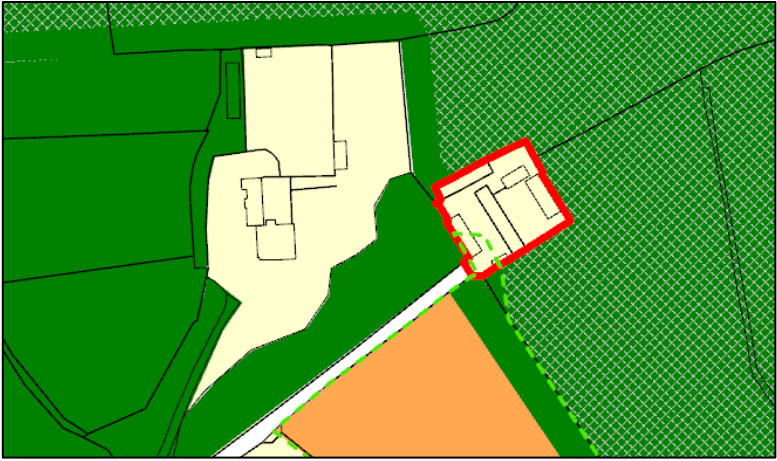
1. *Having regard to the location of the development in proximity to the Murrough SPA, and the Murrough Wetlands SAC, the location of part of the works in Flood Zone A and Flood Zone B, the qualifying interests of these Natura 2000 sites and their conservation objectives, the direct / indirect pathways to these Natura 2000 sites, the absence of sufficient details in respect to the nature and scale of the construction works and ongoing operations the lack of information on the subterranean conditions, the Planning Authority cannot be satisfied beyond reasonable scientific doubt, that the proposed development would not have significant effects on these Natura 2000 sites, and therefore the development would require Appropriate Assessment. Therefore, to permit the proposed development would be contrary to the Habitats Directive, the Objectives of the County Development Plan 2022-2028, the Wicklow Town Rathnew Development Plan 2013, and proper planning and sustainable development.*
2. *Having regard to*
 - *Lack of details in respect to construction/ operation*
 - *Lack of details in respect to the subsoil composition.*
 - *Partial location within a Flood Zone A and Flood Zone B*
 - *The provisions 'The Planning System and Flood Risk Management' Guidelines for Planning Authorities Nov 2009.*
 - *Lack of justification demonstrating the development is necessary on grounds of wider sustainability through the Justification Test outlined in section 3.9 of the guidelines,*

It is considered that the proposed development would contravene objectives CPO 14.26 and Objective CPO 17.26 of the County Development Plan 2022-2028, and the provisions of the Wicklow Town –Rathnew Development Plan 2013, is contrary to the "The Planning System and Flood Risk Management, Guidelines", would set an undesirable precedent for similar types of development on floodplains, would be prejudicial to public health, and would be contrary to the proper planning and sustainable development of the area.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
69	Therese O'Rorke Ref 150417	<p>It is requested that c. 0.2ha of lands, zoned OS1 'Open Space' and OS2 'Natural Areas', be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ A farmyard and outbuildings are evident on historical mapping as far back as 1840. ▪ The zoning of the lands as OS1/OS2 is contrary to CPO8.18 of the Wicklow County Development Plan 2022-2028, that <i>"seeks (through the development management process) the retention, conservation, appropriate repair and reuse of vernacular buildings and features such as traditional dwellings and outbuildings"</i>. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>The lands in question are predominantly zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.</p> <p>As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and</p>		

Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

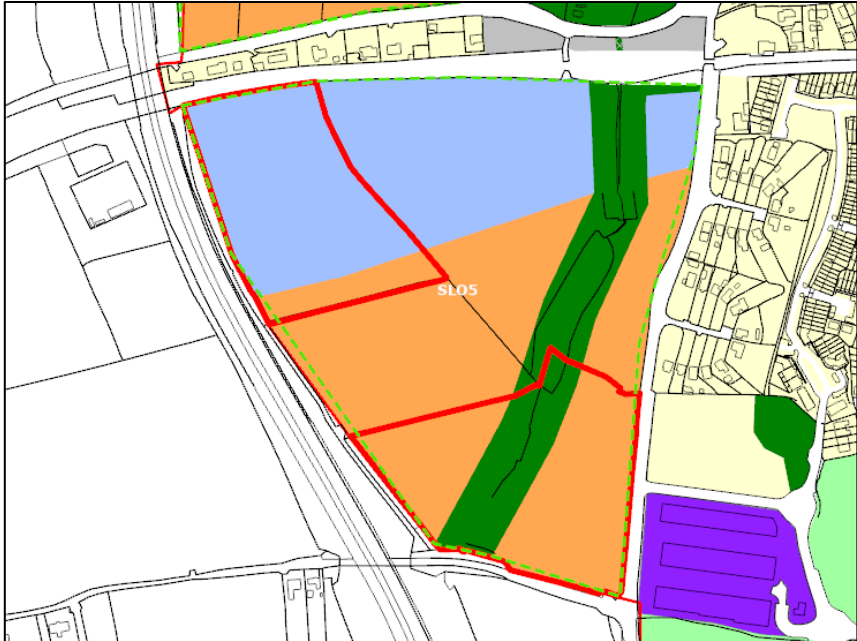
The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

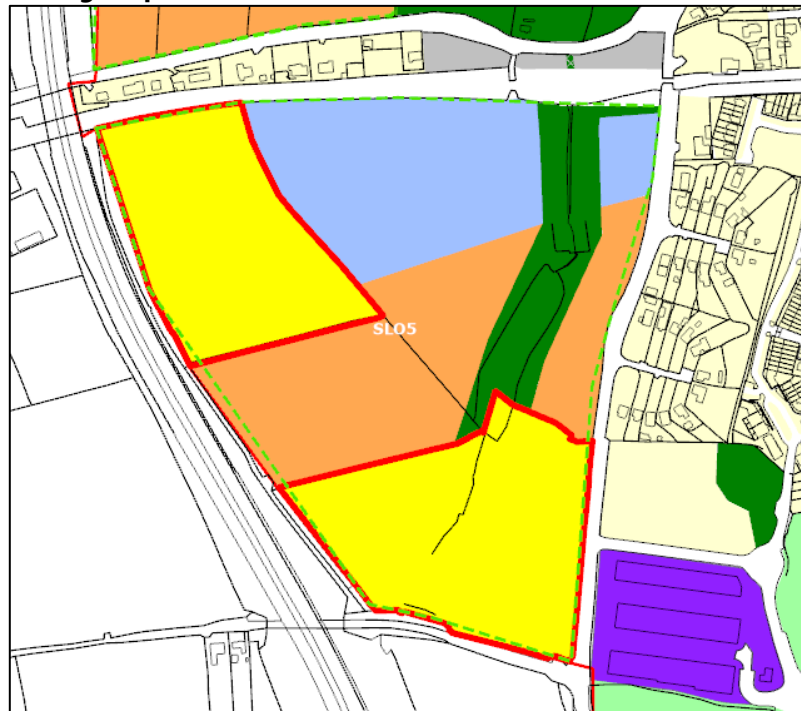
On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
70	Rathnew Partnership Ref 145913	<p>It is requested that lands of c. 8.3ha at Ballybeg, zoned CE 'Community & Education' and RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The table on p. 49 states that the school site to be reserved is 5ha in area, however the area identified in the SLO and also coloured blue on the proposed land use zoning map is 7.7ha and is too expansive. ▪ Lands to the east of site 2 (northern site) are the better location for a school, with direct access to the R772, within walking distance of Rathnew Village, best suited to serve the rural hinterland of the town. ▪ Department of Education considers the demand for secondary school places is generated by 8.5% of the overall population of a catchment area. 2031 target population of 19,400 would need to provide for c.1,650 pupils, current enrolment 2,067 therefore it is assumed that the additional demand (417 places) is created by the population of the rural hinterland, i.e. a demand of 5% created by the hinterland population of c. 8,447. If 1,500 places are needed to cater for the future demand from the hinterland, would be generated by a population of 17,647. A doubling of hinterland population would not be sustainable or acceptable. If current hinterland demand, of 5% of overall population, continues, the 1,500 places would require a population of 30,000. This scenario will never exist. ▪ It is concluded that the proposed zoning of the northern site for CE 'Community & Education' is not necessary. ▪ The draft LAP states that permission for RN2 land will not be considered if housing generated significantly breaches core strategy targets. The development of both sites would yield approximately 150 dwellings, which is not considered a significant impact on Core Strategy targets. ▪ Planning applications have been lodged, with employment uses on the southern site, and residential on the northern site. <p>Draft Zoning:</p> 

Zoning Request:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In these regards, the request for the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would exceed Core Strategy requirements and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

With respect to the extent of the CE zoning and the issues raised with respect to site size requirements for new secondary schools, it is considered that the CE zone may be reduced to c. 5ha, and an additional area of c. 2ha devoted to future residential use RN2. This would not be considered a material breach of the Core Strategy having regard to the controls built into the RN2 objective.

In relation to the area zoned OS1 'Open Space' in the Draft LAP, this zoning is necessitated to fulfil CPO 17.26 of the Wicklow County Development Plan 2022-2028 which states the following:

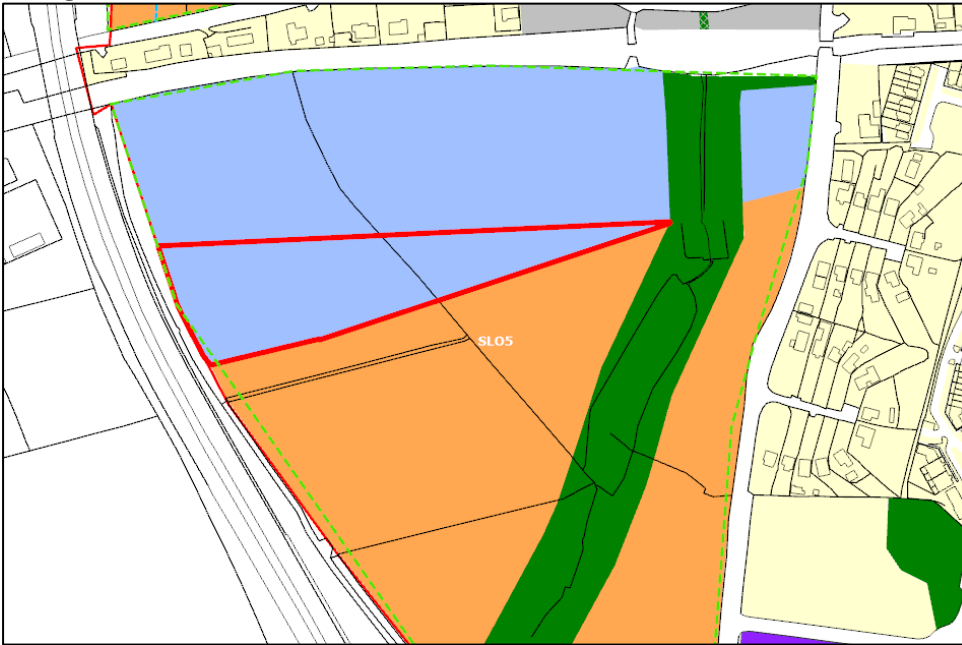
'Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.'

Therefore no changes to the OS zone are recommended.

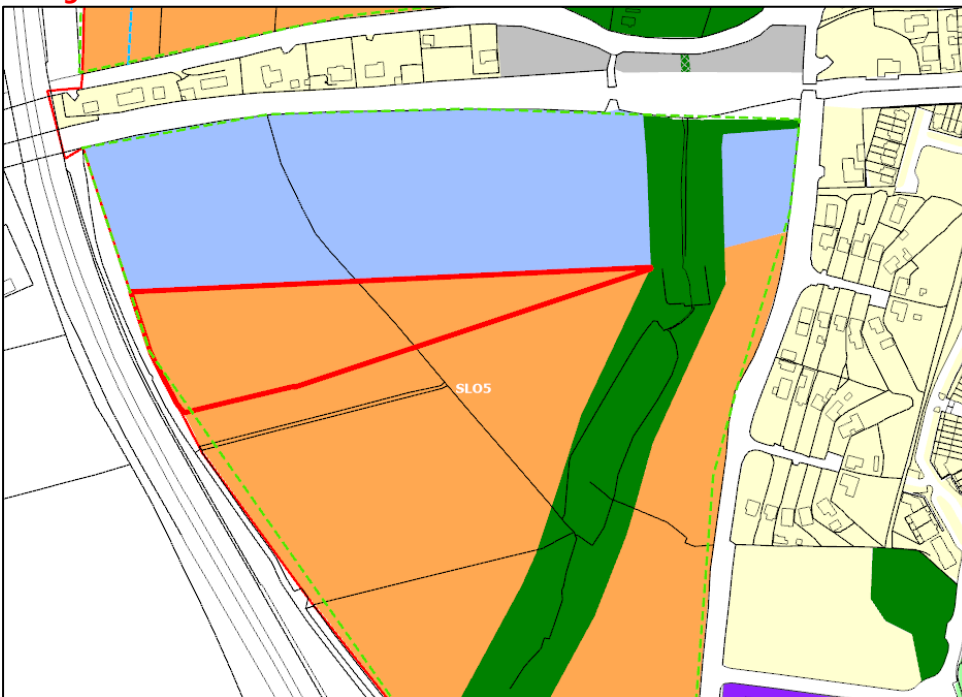
Chief Executive's Recommendation

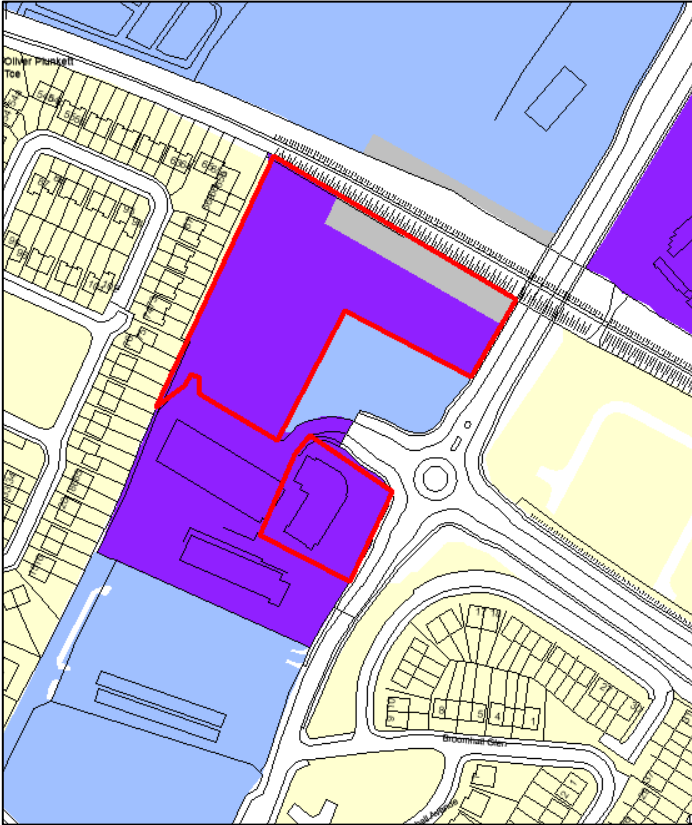
Amend land-use zoning map as follows:

Change from:

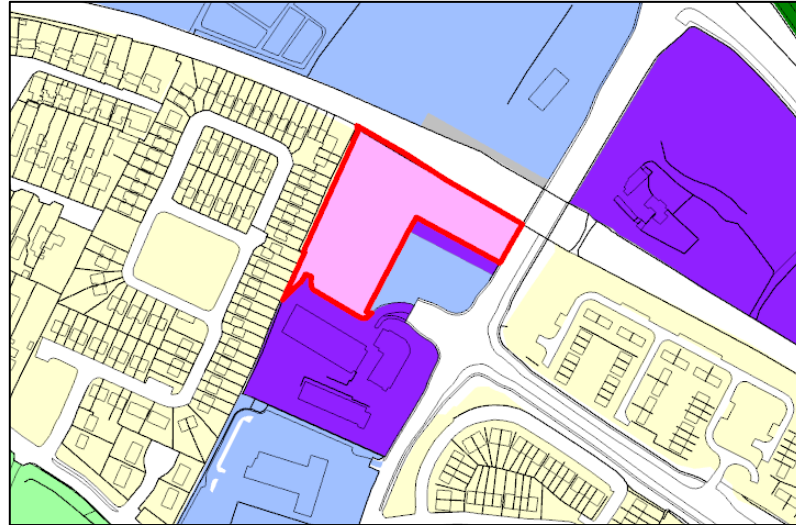


Change to:



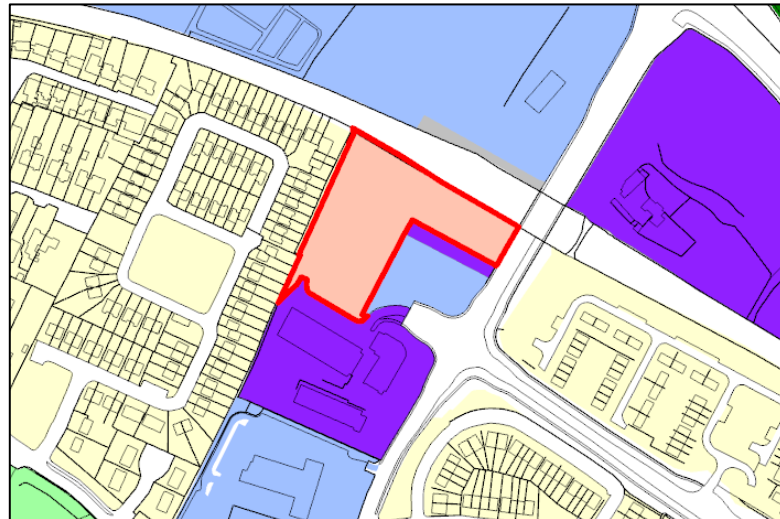
No.	Name	Issues Raised
73	HK Partnership Ref 175606	<p>This submission relates to 2 parcels of lands at Merrymeeting (as show below) It is requested that the northern parcel of c. 1.05ha , zoned E 'Employment' and PU 'Public Utility', be zoned either LSS 'Local Shops & Services' or NC 'Neighbourhood Centre'.</p> <p>It is further requested that the southern parcel of c. 0.24ha, zoned E 'Employment', maintain that zoning and the current range of typical uses open for consideration on such lands.</p> <p>In support of the rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The uses and objectives associated with the LSS 'Local Shops & Services' or NC 'Neighbourhood Centre' zonings are broad enough to provide ample and appropriate development options, especially given the limited development and occupation interest in E-zoned sites at this location. ▪ The site is in a highly mixed-use location. The LSS or NC zoning will 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'. This has the potential to deliver a localised offering of retail spaces, personal and professional services units, housing and community/recreational uses. ▪ Little expansion of mixed use zoning designations to the south-east of Rathnew village centre despite strong residential and community use growth. ▪ The entrances to Brookfield Park, Saunders Lane, Kirvin Hill, and Sea Scape are beyond 15-minutes' walk to Aldi in Rathnew village. <p>Draft Zoning:</p> 

Zoning Request:



LSS 'Local Shops & Services'

or



NC 'Neighbourhood Centre'

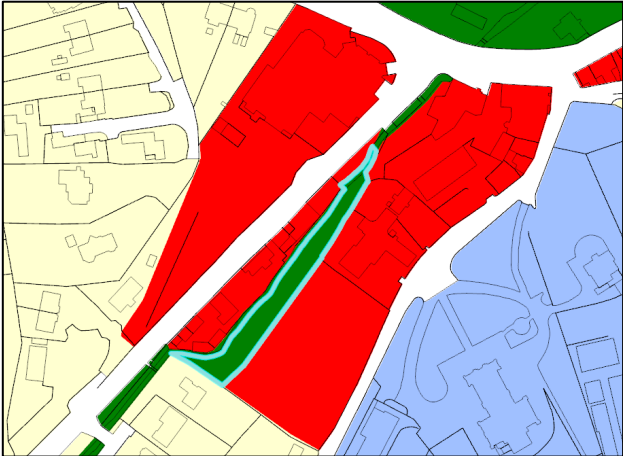
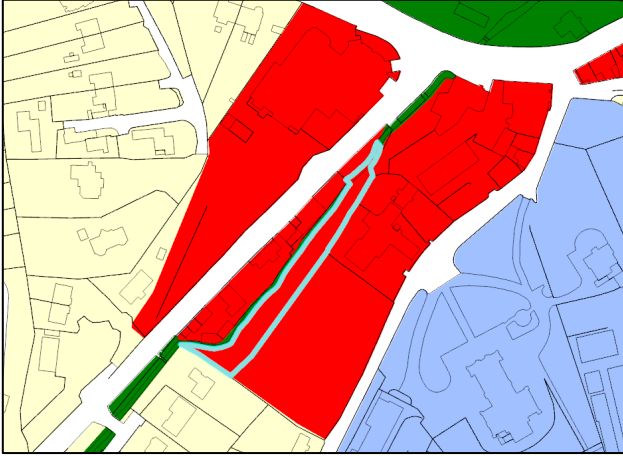
Chief Executive Response

Having regard to the location of these lands vis-a-vis the existing town / village centres of Wicklow Town and Rathnew and the existing neighbourhood centre at Broomhall (less than 300m from these lands), these lands are not considered optimal or necessary for such use. In particular, the development of the suggested retail / retail services type development at locations outside of the historic centres risks diminishing the viability and vitality of these centres, by drawing trade and activity away from them. The development of these lands for other employment related mixed uses, such as offices, professional services etc, as well as community uses, is already facilitated by the E zoning.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
74	HK Partnership Ref 175917	<p>It is requested that c. 0.14ha of lands at Wicklow/Ballynerrin Lower, zoned OS1 'Open Space', be zoned TC 'Town Centre'. It is further requested that the adjacent lands, zoned TC 'Town Centre' in the Draft LAP, retain that zoning. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ A planning application is intended to be lodged in the coming weeks, with pre-planning consultation feedback received on 1st July 2024. ▪ Access to the overall lands of c. 0.77ha is required from both sides – Marlton Road and St. Patrick's Road – due to the site's topography and the position of existing site services. ▪ The zoning of the north-western strip of the site as OS1 'Open Space' risks sterilising its development potential, thereby making it undevelopable. ▪ It will be necessary to traverse the watercourse to the site's west and provide shared surface infrastructure parallel to the watercourse at the location of the proposed OS-zoned area. ▪ Riparian protection benefits (ecology, water quality, flood mitigation, etc.) that the OS1 zoning would provide are acknowledged, however it is contended that many of these can still be secured by way of carefully considered design, landscaping and site management. ▪ Field surveys did not reveal any species or habitats of note or requiring statutory protection. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

	<p>It is further requested that the typical appropriate uses for open space zonings (incl. OS1, OS2, AOS) be amended to include the following: <i>"Additionally, consideration will be given to appropriate 'ancillary urban and residential development', such as site accesses and roads (including vehicular, cyclist and pedestrian infrastructure) and utilities."</i></p> <p>In support of this change, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Consideration must be given to facilitating ancillary urban and residential development on open space zoned lands where such development is necessary to serve or unlock other sites which may otherwise be landlocked by way of the zoning of lands, topography or the existing provision of services. ▪ The Meath County Development Plan 2021-2027 includes 'utilities' as a permitted use and 'vehicular/cyclist/pedestrian access to zoned lands where appropriate' as being open for consideration in its 'F1 – Open Space' zoning.
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Chief Executive Response

CPO 17.26 of the Wicklow County Development Plan 2022-2028 states the following:

'Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.'

In order to give effect to this objective, the zoning provisions of the draft LAP have endeavoured to integrate such riparian buffers / corridors wherever feasible. In this case, a buffer along the south side of the watercourse, where the land is undeveloped, of only 10m is identified, in recognition of the town centre, built up nature of lands surrounding it. This is not considered an excessively onerous requirement.

This objective would allow for the crossing of the watercourse riparian zone, subject to any such crossing being of suitable design.

Therefore the CE does not recommend the zoning of these lands for TC 'Town Centre' development.

Open Space Zoning – appropriate uses

It is considerable reasonable to amend the text to allow for essential service infrastructure, such as road / footpaths / cycleways etc to be open for consideration in OS1, OS2 and AOS zones, subject to such infrastructure not undermining the objective of these open space zonings.

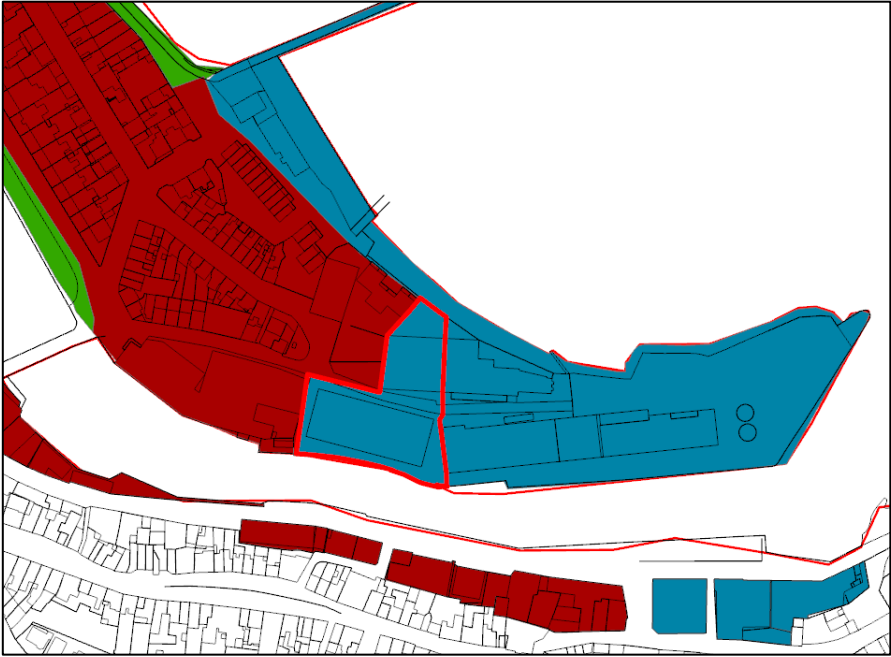
Chief Executive's Recommendation

Amend CHAPTER 11 ZONING AND LAND USE as follows:

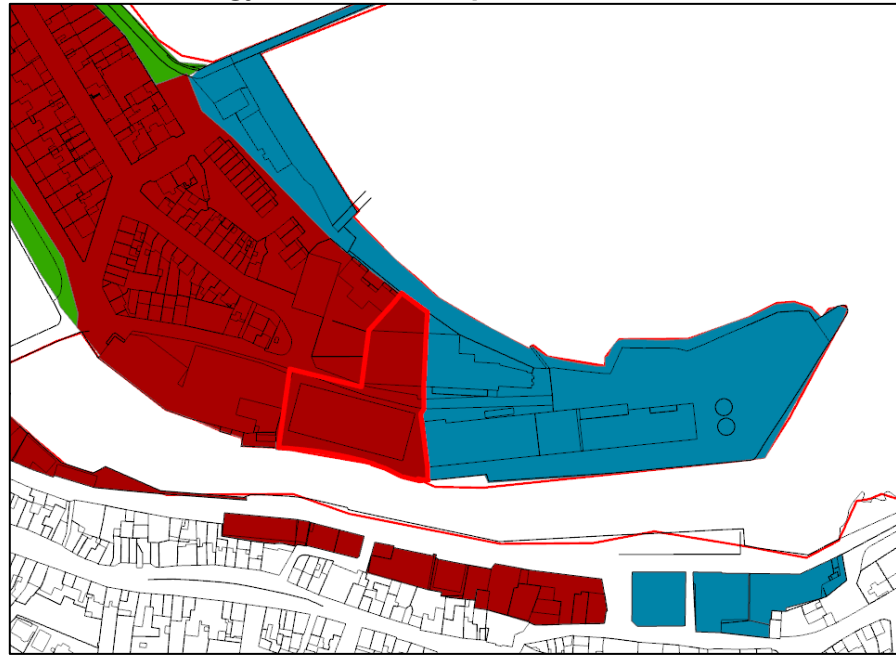
11.1 Zoning Objectives

Insert new sentence at end:

Essential infrastructure, including roads / footpaths / cycleways and utilities that are necessary to support development lands, are generally permissible in all zones. Where such infrastructure would be required in OS1 or OS2 zones, and no other routes are viable, such infrastructure shall only be considered where it is shown it will not undermine the purpose of this zoning or give rise to adverse environmental impacts.

No.	Name	Issues Raised
77	John P. Hopkins and Sons Ltd Ref 181735	<p>It is requested that the Waterfront Zone Strategy Map is amended such that c. 0.5ha of lands at Corporation Murrrough, in Waterfront Area 1 (Wicklow Port), be designated within Waterfront Area 3 (Mixed Use Regeneration Area) – or otherwise remove the distinction between areas in the waterfront zone. In support of this change, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Hopkins Warehouse has not been used for port related activities since it was purchased in 1998. ▪ The port related use zoning has acted as a barrier to the redevelopment of the site. The proposed waterfront zoning is an improvement allowing for greater flexibility in the permitted uses. ▪ The port tonnage is stagnant since 2013 and is of no significance in the national context and is only of regional importance. ▪ The subject site should be included in the mixed use regeneration area as it does not and has not contributed to the port activities nor has it even been sought for that purpose. ▪ The linkages map on p.37 indicates a new connection between the north and south quays to the west of the site, it makes little sense for such a link to be into a working port. The bridge should be at the boundary between the port and mixed/leisure uses and create potential for a south facing public space where the bridge lands on the north bank of the river. <p>Draft Waterfront Strategy Map:</p> 

Waterfront Strategy Amendment Request:



It is further requested that planning policy wording should be adjusted to 'resist development that would undermine the existing port uses'.

Chief Executive Response

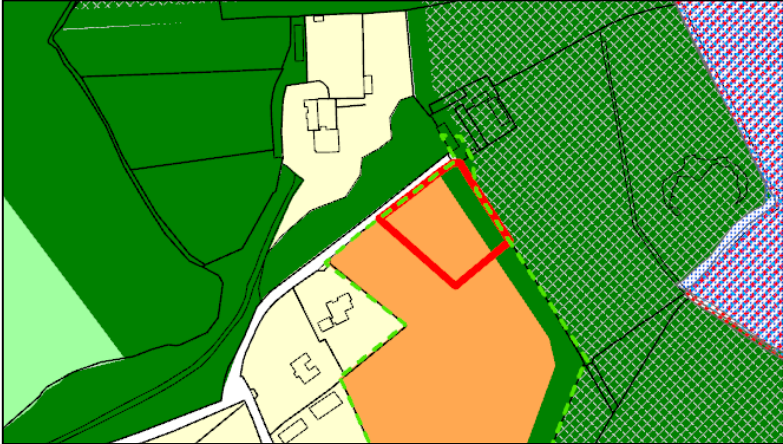
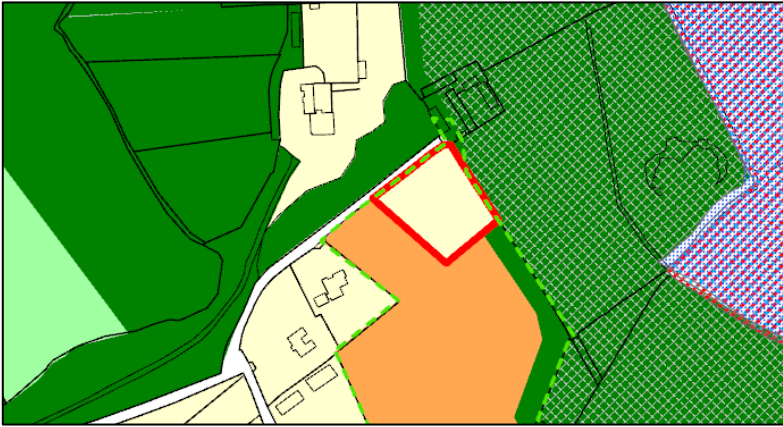
The CE does not support the zoning change requested on the grounds that it is essential for the future commercial development of the port area that a sufficient land bank, designated for port development use, is maintained. The CE is satisfied that there is more than adequate land identified for 'regeneration' in the Waterfront Zone to ensure that this area can be revitalised with a wider range of uses.

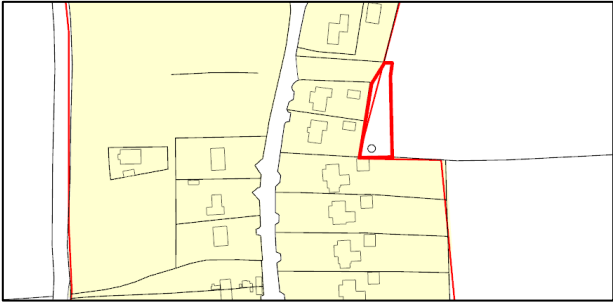
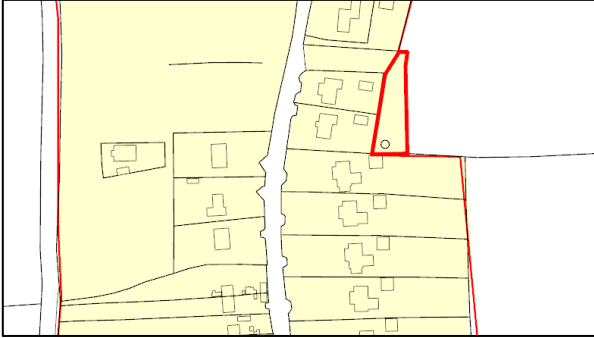
It is also important to note that the Area 1 (Wicklow Port) designation does provide flexibility to consider other non-port related uses where it can be demonstrated that uses of any site for these non-port / maritime uses would not:

- undermine the role of this area to support and provide services to maritime activity
- prejudice this area remaining and being developed further for maritime activities
- interfere with or remove maritime infrastructure such as quay space for docking

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

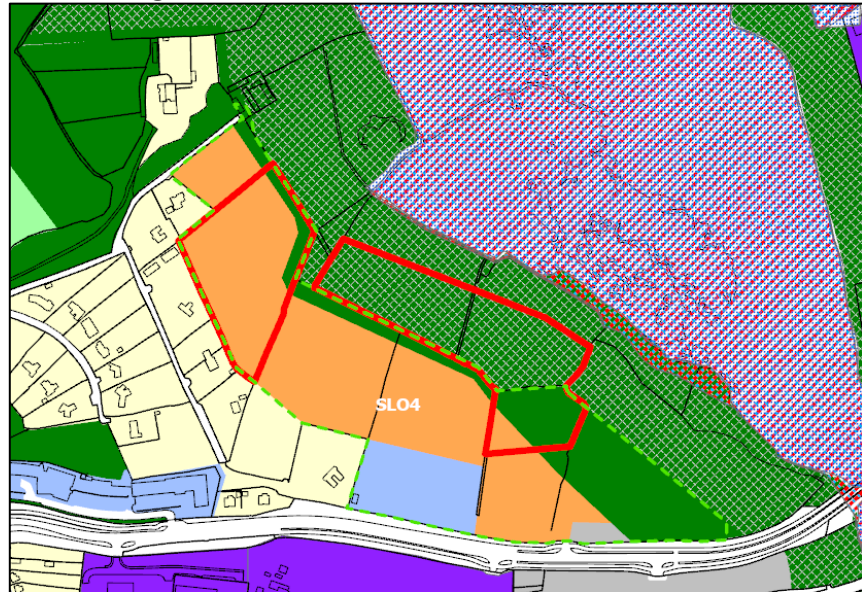
No.	Name	Issues Raised
78	<p>Therese O' Rorke Ref 183214</p>	<p>It is requested that c. 0.367ha of land at Knockrobin, zoned RN2 'New Residential – Priority 2' and OS1 'Open Space', be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The owner of Knockrobin Farm, including the farmyard and outbuildings, seeks to retain the proposed development site for her personal use. ▪ The site is accessed via a private avenue with gated entry within her ownership. ▪ The submitter does not have a house of her own. ▪ The submitter's three sons have established homes in the area or have previously obtained planning permission for such. ▪ The site would complete a cohesive rural cluster for the O'Rorke family at Knockrobin reinforcing lifelong connection to the farm land and ensuring its continued use as a family homestead. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 
<p>Chief Executive Response</p>		
<p>The zoning of the subject lands as RE 'Existing Residential' would not be consistent with the objective of that zoning, in that no existing residences are present on the subject lands. The draft RN2 'New Residential – Priority 2' zoning allows for residential development in line with all prevailing development objectives and standards.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

No.	Name	Issues Raised
85	John and Julie Fitzgerald Ref 210037	<p>It is requested that c. 0.1ha of land at Ballyguile Beg, currently outside of the settlement boundary and without a specific land use zoning, be zoned for residential use within the settlement boundary. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ This area was zoned residential in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ No stated reason or explanation has been given for the removal of this zoning. ▪ Considerable expense has been invested in anticipation of lodging a planning application, following consultation with Wicklow County Council planning department. ▪ Reducing the development area is inconsistent with the Council's stated objective of providing for the housing needs of a growing policy and with national policy. <p>Draft Zoning:</p>  <p>Zoning Request (incl. boundary change):</p>  <p>[Note that a specific residential land use zoning was not specified in the submission, it is assumed that RE 'Existing Residential' zoning is requested on the basis of the surrounding land use zoning.]</p>
<p>Chief Executive Response</p>		
<p>It appears that the inclusion of this small plot in the plan boundary and RE zone in the previous plan is a mapping irregularity as the boundary surrounding this site follows the rear boundaries of existing properties. There have been no applications made for the development of these lands on foot of the 2013 plan (last application on these lands was in 2005, which was refused), and no pre-planning request made since 2013.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Wicklow Town – Rathnew Local Area Plan 2025</p>		

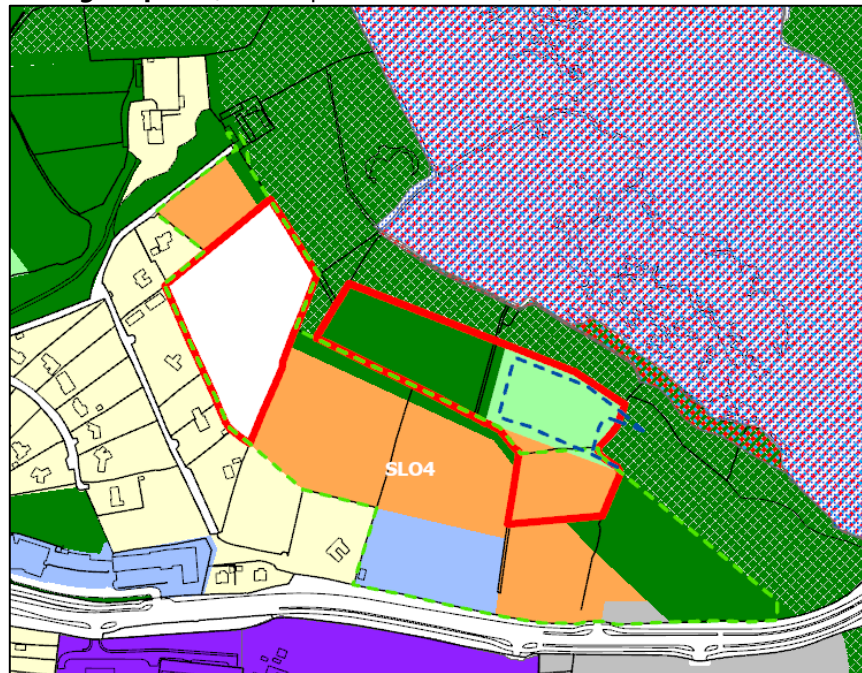
No.	Name	Issues Raised
86	<p>Therese O'Rorke Ref 205842</p>	<p>[The submission makes reference to zoning requests as set out in other submissions made to the Draft Wicklow Town-Rathnew LAP 2025, including Nos. 52 (DWTRLAP-093521), 69 (DWTRLAP-150417), and 78 (DWTRLAP-183214) in the same ownership, and No. 91 (DWTRLAP-210849) in separate ownership. These requests are assessed separately in this report.]</p> <p>This submission relates to two plots of land in Knockrobin – Bollarney North as outlined in red on the map below related to SLO4. The following is requested:</p> <ul style="list-style-type: none"> ▪ That zoning be completely removed from lands of c. 1.93ha zoned RN2 'New Residential – Priority 2' at Knockrobin. ▪ That zoning be completely removed from lands of c. 0.226ha zoned OS1 'Open Space' at Knockrobin. ▪ That lands of c. 1.4ha at Bollarney North, zoned OS2 'Natural Areas', be zoned OS1 'Open Space'. ▪ That lands of c. 1.07ha at Bollarney North, zoned OS2 'Natural Areas', be zoned AOS 'Active Open Space'. ▪ That lands of c. 0.63ha at Bollarney North, zoned OS1 'Open Space', be zoned RN2 'New Residential – Priority 2'. ▪ It is further requested that the objective to create a linear green route for walking and cycling be removed from SLO4, with a loop trail proposed in AOS 'Active Open Space' lands to connect to adjacent lands in separate ownership. <p>In support of these zonings, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The proposal draws direction from SLO4-Bollarney North concepts. ▪ The OS2 'Natural Areas' lands in the proposals specifically advocates to acknowledge the LAP objective for the preservation of land situated adjacent to the existing marshland, which serves as a natural boundary to the SAC-designated area. ▪ The OS1 'Open Space' lands in the proposals will serve as a public park and is naturally bounded by the mature woodland to the west, a hedgerow and trees to the east and hedgerows off the natural area adjacent to Broadlough marsh and SAC-designated area. ▪ The AOS 'Active Open Space' lands in the proposals is intended to complement the 0.79ha RN2 'New residential – Priority 2' in the same ownership and adjacent lands in separate ownership, with access route through those adjacent lands. The AOS lands include a loop trail for walking, cycling and jogging, enhancing recreational opportunities. ▪ 0.79ha of lands requested to be RN2 are within 500m of Wicklow's transportation hub, for sustainable residential development at medium to high density, promoting compact growth and enhancing connectivity. ▪ Part 8 application 24/407 for a pedestrian and cycle bridge over the railway, new car park, and separately the planned extension of the DART to Wicklow Town will significantly increase the accessibility and appeal of the area, perfectly aligning with national policies promoting sustainable and transit-oriented development. <p>In support of the removal of the linear green route from SLO4, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The proposed route traverses a gated access road, open countryside and active farmland currently used for crops and livestock, making it unsuitable.

- Wicklow County Council has not addressed who would fund the construction of an 8m wide thoroughfare, including public lighting, ongoing maintenance, and insurance for a publicly accessible route.
- Large sections of the route lack active or passive supervision, raising significant safety concerns, would likely result in anti-social behaviour and would compromise the safety of both the private dwellings it passes.
- A purpose built public footpath/2-way cycle route already exists on both sides of the public road leading to Tinakilly, this proposes linear green route is purely aspirational and unnecessary.

Draft Zoning:



Zoning Request (incl. loop trail in dashed blue):



Chief Executive Response

- The suggested additional residential, OS1 and AOS uses would be located on lands proposed for OS1 and OS2 zoning in the draft LAP. The lands in question are predominantly zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

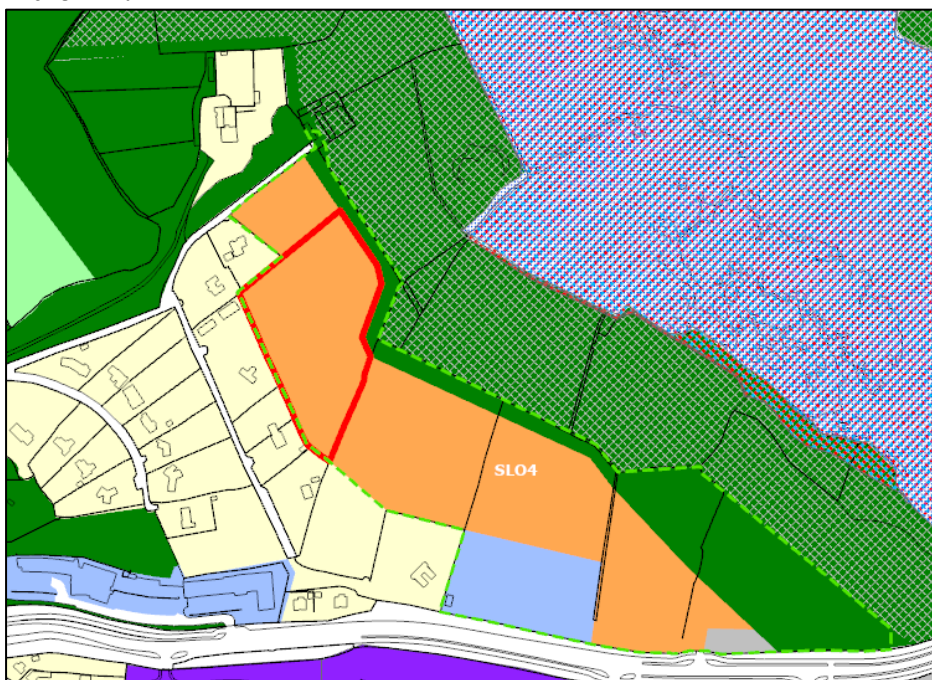
The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.
- The suggested dezoning of proposed RN2 lands is somewhat spatially illogical, given the request to maintain and expanded residential zoning either side of same. However, in light of the request, it is recommended that these lands be zoned OS1.
- With respect to suggestion re green routes the CE is satisfied that the SLO4 objectives are optimal and reasonable and no changes are recommended.

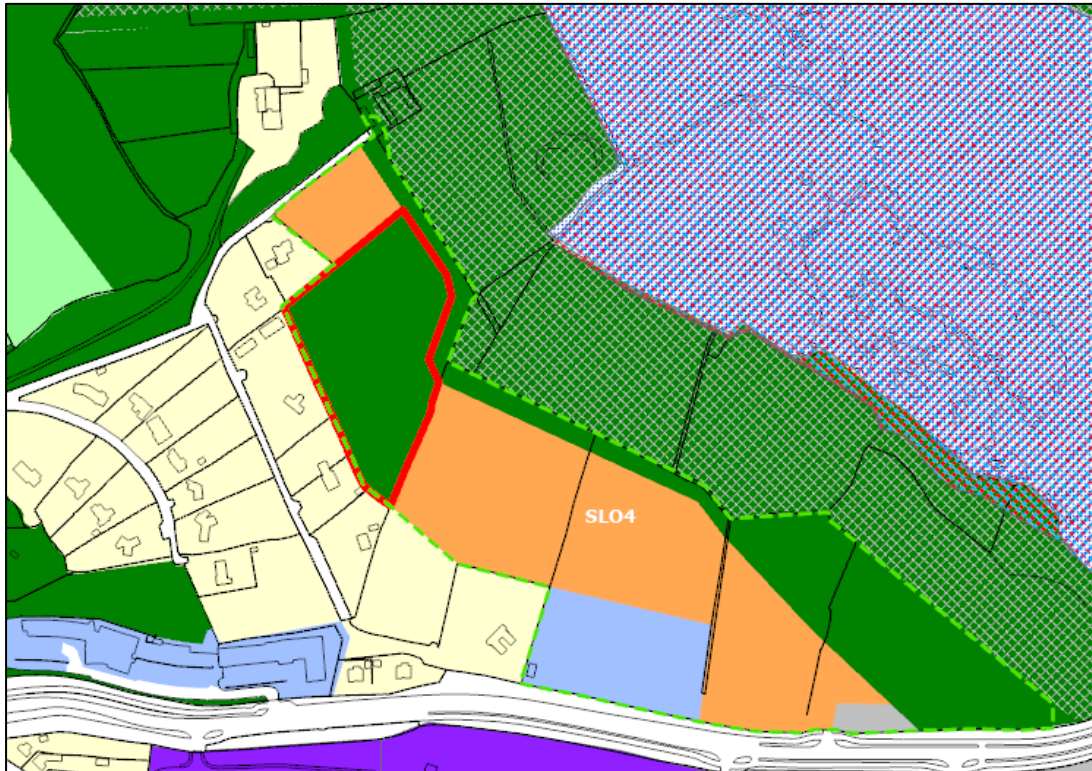
Chief Executive's Recommendation

Amend land-use zoning map and SLO4 as follows:

Draft LAP:



CE Recommendation:

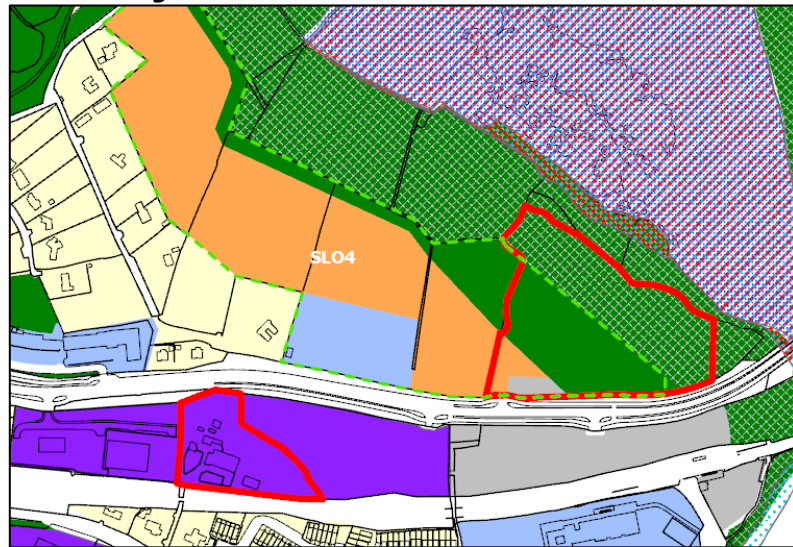


No.	Name	Issues Raised
91	<p>Noel Heatley Ref 210849</p>	<p>This submission relates to two parcels of lands either side of the Port Access Road, as outlined in red on the map to follow.</p> <p>It is requested that c. 1.2ha of lands at Bollarney North, zoned E 'Employment' on the south side of the PAR,, be zoned RE 'Existing Residential' following the 17.00 OD contour. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The lands contain the original farmhouse yard outbuilding and family home that is still in active use. ▪ The E 'Employment' zoning conflicts with CPO 8.18 of the Wicklow County Development Plan 2022-2028, to <i>"seek (through the development management process) the retention, conservation, appropriate repair, and reuse of vernacular buildings and features such as traditional dwellings and outbuildings."</i> ▪ The farmhouse is serviced and in good repair, and there is an intention to construct a meandering private driveway leading to the timber gate on the Port Road. ▪ RE 'Existing Residential' zoning of the lands aligns with objectives of the CDP, particular in preserving/reusing vernacular architecture. <p>With respect to the parcel to the north of the PAR, the following is requested:</p> <ul style="list-style-type: none"> ▪ That c. 0.65ha of lands at Bollarney North, zoned OS1 'Open Space', OS2 'Natural Areas', RN2 'New Residential – Priority 2', PU 'Public Utility', be zoned PU 'Public Utility'. ▪ That c. 1.15ha of lands at Bollarney North, zoned OS2 'Natural Areas', OS1 'Open Space', PU 'Public Utility', be zoned AOS 'Active Open Space'. ▪ That c. 2.14ha of lands at Bollarney North, zoned OS2 'Natural Areas', OS1 'Open Space', PU 'Public utility, RN2 'New Residential - Priority 2', be zoned RN2 'New Residential - Priority 2' <p>In support of these rezonings, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ SLO4 requires access, a 50 space car park and a 2ha public park on the subject lands, with no residential development feasible on the lands to fund these objectives. Therefore these objectives are aspirational. ▪ During negotiations for the port access road, assurances were made that lands north and south of the road would be designated for development. ▪ The previous mixed use zoning of the lands under the Wicklow Town Development Plan 2007-2013, with permission granted at that time. ▪ The lack of development under the E 'Employment' zoning under the Wicklow Town-Rathnew Development Plan 2013. ▪ Lands at Tinakilly represent over one-third of RN1 lands, where delays could stall development on RN2 lands alongside the Residential Zoned Land Tax payments. ▪ Lands are ideally positioned for compact growth in line with the NPF. ▪ Lands are not part of the natural landscape and are actively farmed, and are segregated from the SAC by mature trees and shrubbery. No risk of flooding. ▪ A looped greenway [as proposed in requested AOS 'Active Open Space' lands] would serve as a green natural barrier/buffer and link to adjacent lands in separate ownership. ▪ Wicklow County Council's Part 8 for a pedestrian and cyclist bridge over the

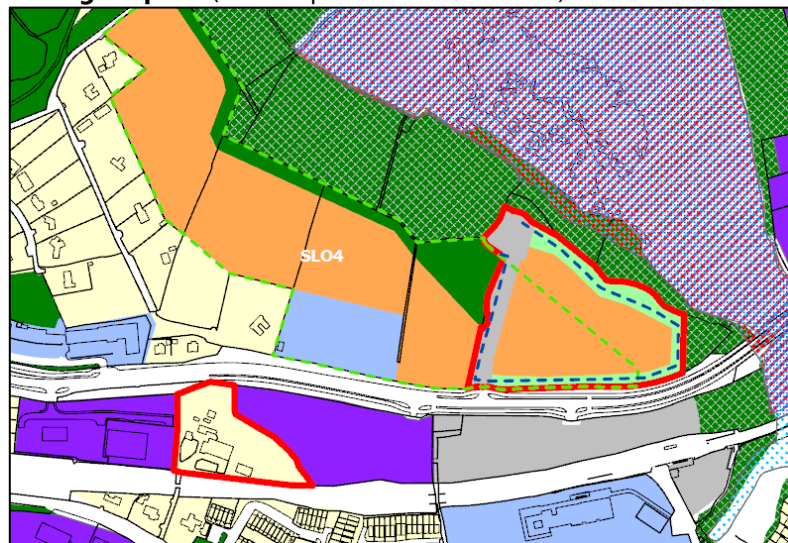
rail line will enhance the connectivity of the lands.

- The extension of the DART to Wicklow Town will allow for development in line with national policies on transit-oriented development.
- Lands requested to be PU 'Public Utility' can serve all lands north of the port access road and can include a car park of minimum 50 spaces.
- The importance of protecting areas associated with the SAC is acknowledged, the rezoning requests advocate for a balanced approach.
- The Draft LAP SEA Environmental Report indicates the requested RN2 area as being of the lowest level of environmental sensitivity.
- An adjoining landowner has made a submission requesting the removal of c. 2.45ha of RN2 –New Residential – Priority 2' lands. The additional RN2 lands requested in this submission ensures that the overall quantum of RN2 lands remains unchanged.
- The rezoning aligns with Housing for All and policy directive encouraging higher residential densities within 500m of a transport hub.

Draft Zoning:



Zoning Request (incl. loop trail in dashed blue):



Chief Executive Response

Lands south of PAR: The suggested change is not supported as the 'E' zoning would not preclude the ongoing use and development of the existing residence on the lands. Zones often contain non-conforming uses. This is explicitly addressed in the draft LAP.

On foot of this submission, no amendments to the LAP are recommended.

Lands north of PAR / SLO4

The suggested additional residential, AOS and PU uses would be located on lands proposed for OS1 and OS2 zoning in the draft LAP. The lands in question are predominantly zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.



The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
105	Pathway Homes Ltd. Ref 090551	<p>It is requested that c. 0.6ha of lands in the vicinity of Corporation Murrough, with no specific land use zoning, be zoned within Area 3 of the Waterfront Zone Strategy. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ It is understood that this land is within the ownership of Wicklow County Council. ▪ This land could serve an important function in terms of the future development of Area 3, specifically an area of public open space towards the end of the riverside walk, and an improved link through to the pedestrian bridge adjacent to the railway bridge, with an objective to facilitate the provision of such as part of any proposed regeneration. <p>Draft Waterfront Zone Strategy Area:</p>  <p>Waterfront Zoned Strategy Area Request:</p>  <p>It is further requested that the text of Section 11.2 of the Draft LAP written statement is amended as follows:</p>

"Within Area 3 (Mixed Use Regeneration Area) ~~the following uses are deemed 'priority uses and will be permitted in principle~~ the planning authority will encourage residential led schemes as a means of achieving regeneration of the Area 3 lands and introducing a residential community to the Waterfront. The following non-residential uses are deemed 'suitable uses and will be actively encourage to be delivered in a mixed use approach in conjunction with residential development principle:

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
- *High quality community, civic / cultural and recreation uses;*
- *High quality retail, retail services, restaurants, public house, café;*
- ~~*High density residential use where developed in conjunction with other priority uses described above.*~~

It is recognised that Area 3 comprises relatively extensive lands and regeneration is likely to be achieved by way of multiple planning applications. For clarity, each planning application will be required to make an appropriate contribution to the delivery of one or more of the above uses, however it is recognised that the preferred range and mix of uses listed above is intended be delivered across the entire of Area 3.

Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area."

In support of this text change, the following grounds are put forward:

- There is a concern that the language used in relation to priority uses may lead to an interpretation that single application within Area 3 (relating to only part of the area) would or could be required to deliver an extensive range of these uses, and perhaps therefore making a development unviable.
- Feasibility studies have indicated that a strong quantum of residential must be included in the landholding of Pathway Homes [adjacent to the lands requested for rezoning above] to make development viable.

It is further requested that Objective WTR72 of the Draft LAP written statement be amended as follows:

*"To encourage and facilitate tourism and leisure related uses in the Mixed Use Regeneration Area of the Waterfront zone ~~including hotel / accommodation facilities and leisure uses~~ to complement the marina and associated boating uses and activities. *Such uses can be in the form of complementary public open space, active routes and trails, which improve connectivity between the waterfront and the riverside.*"*

In support of this text change, the following grounds are our forward:

- Land use policy should not be so prescriptive as to the location of a particular niche use such as a hotel so as to potentially sterilise the development of a wider site.
- The primary focus of the Waterfront zoning objective in the context of the Murrough should be to facilitate regeneration of the lands. An overly

	<p>prescriptive requirement for a hotel has the real potential to sterilise mixed use regeneration on the site, market flexibility must be allowed.</p> <p>It is further requested that Objective WTR54 should be deleted: "Seek the provision of a central civic space at the Murrough mixed use regeneration area; surrounded by retail, small enterprise and cultural or civic uses, with clear and legible connections to the surrounding development, the river edge and coast/linear public park."</p> <p>In support of this text change, the following grounds are put forward:</p> <ul style="list-style-type: none"> - To ensure that the layout and urban design of the regeneration site is not unduly influenced by the LAP without full consideration at detailed design stage of all influencing factors for the site.
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Chief Executive Response

Zoning change:

Some of the lands that are requested to be zoned 'mixed use regeneration area' are partially located in a European Site and therefore cannot be considered for zoning.

The boundary of the SAC and SPA at this location has recently been altered, and therefore there may be scope to extend the zoning.

Having considered the possible impact on any extension of zoning in this area on the adjacent European Site (The Murrough SPA) it is considered that:

1. There are no additional sources for effects on European sites arising that have not been considered by the AA to date. Taking into account the mitigation measures that have already been integrated into the Draft Local Area Plan and the existing County Development Plan, this change would not affect the integrity of any European site.
2. The change would further contribute towards provisions related to sectors and topics that are already provided for within the Draft Local Area Plan and the existing County Development Plan. Taking into account the measures that have already been integrated into the Draft Local Area Plan and the existing County Development Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, any potential effects arising from this change would either: be present already (beneficial) and would be further contributed towards, but not to a significant extent; and/or would be mitigated so as not to be significant (adverse).

Taking this into account, this change would not be likely to result in significant environmental effects.

Text changes:

The CE does not support the majority if the text changes suggested. It is clear that the Council's goal is that residential use will only be supported where it is in conjunction tourism, employment, community, retail and other mixed uses. A range of uses, and particularly uses at the ground level that bring activity, visitors and employment to the area, are essential and a priority above residential development in this area. In addition, the Council is committed to the delivery of a hotel and other tourism accommodation in this area, and the objectives supporting same are considered reasonable.

The following amendment is however recommended in the interests of clarity:

"Within Area 3 (Mixed Use Regeneration Area) the following uses are deemed 'priority uses' and will be permitted in principle

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
- *High quality community, civic / cultural and recreation uses;*
- *High quality retail, retail services, restaurants, public house, café;*

- *High density residential use, where developed in conjunction with **at least one and ideally a number of** other priority uses described above.*

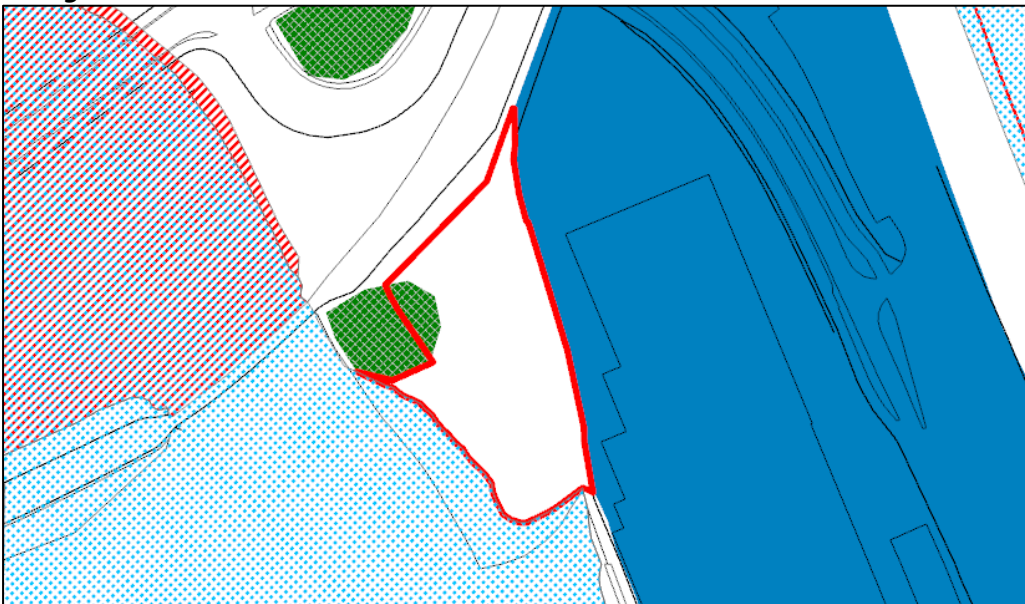
Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area."

Chief Executive's Recommendation

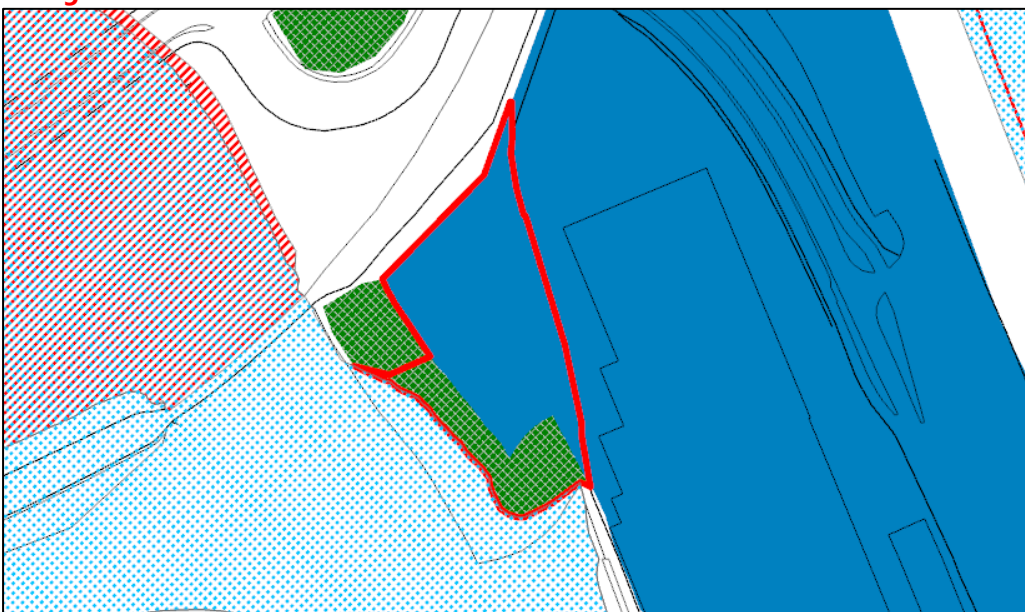
Amend land use zoning map and Waterfront Zone Strategy Map as follows:

Land Use Zoning Map

Change from:



Change to:



Waterfront Strategy Map:

Change from:



Change to:

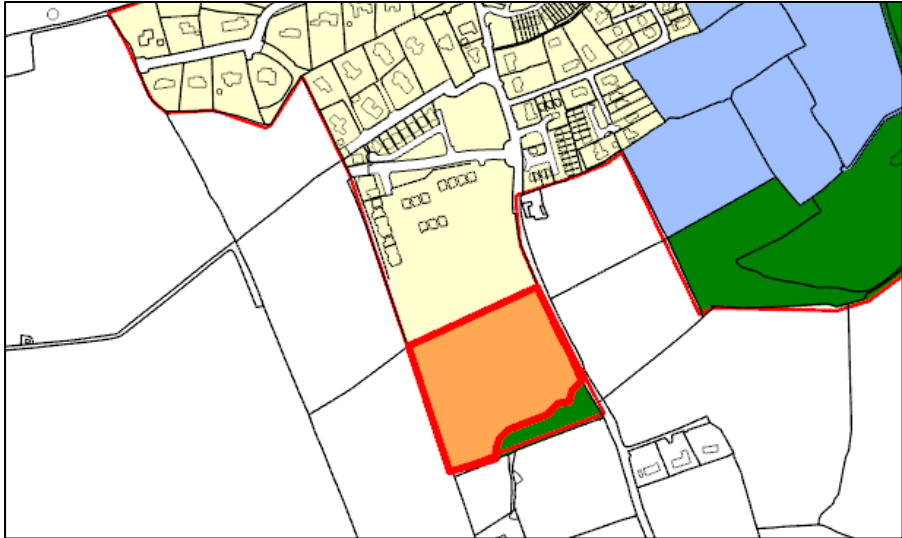


Amend WZ Zoning Objectives as follows:

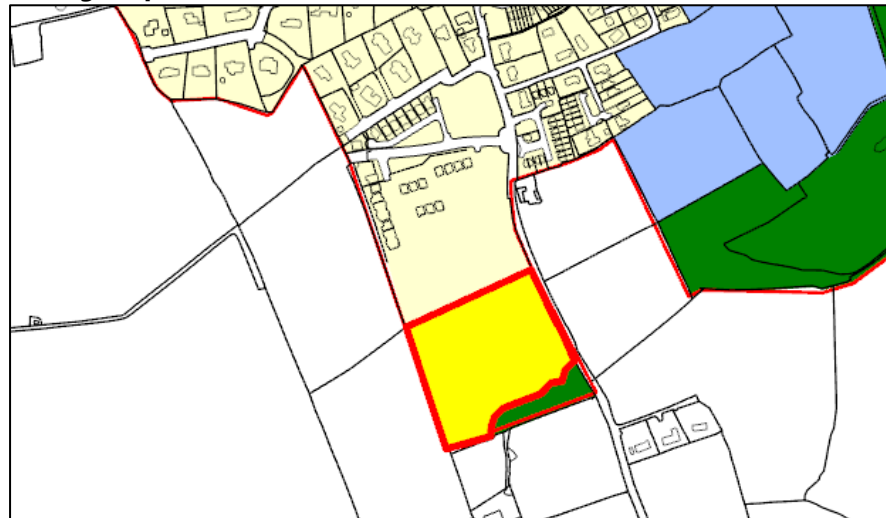
"Within Area 3 (Mixed Use Regeneration Area) the following uses are deemed 'priority uses' and will be permitted in principle

- *High intensity and high quality tourist accommodation, such as hotels, holiday apartments etc. Low density tourism accommodation such as holiday homes, glamping etc will not be considered;*
- *High intensity and high quality employment uses such as offices, enterprise hubs, education / training centres;*
- *High quality community, civic / cultural and recreation uses;*
- *High quality retail, retail services, restaurants, public house, café;*
- *High density residential use, where developed in conjunction with **at least one and ideally a number of** other priority uses described above.*

Wherever possible, new developments in Area 3 shall include active street frontage. Developments that entail the removal / relocation of existing low intensity uses (such as single storey buildings, warehouses etc) with higher value uses will be particularly supported in this area."

No.	Name	Issues Raised
107	Ardale Property Group Ref 092310	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>Requested that c.3ha of lands at Ballyguile More, zoned RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Previous/extant planning permissions on the site. ▪ The site is a brownfield site serviced by footpaths and roads, serviceable by water and wastewater infrastructure, with access to a variety of existing amenities. ▪ The site does not contain protected structures or is within an Architectural Conservation Area or special area of natural heritage. ▪ The previous 'R4 – Residential' zoning of the southern part of the lands under the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ The landholder has a track record of housing delivery, with a live application on the subject lands. ▪ The Ballyguile More Footpath Part 8 Scheme will form a natural extension of the settlement boundary and will bring appropriate new public infrastructure directly adjacent to the subject lands. ▪ The subject lands have been determined by WCC as fulfilling the qualifying criteria for the Residential Zoned Land Tax. <p>Draft Zoning:</p> 

Zoning Request:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the alteration of the phasing of residential development from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1' as detailed in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
108	<p>Ardale Property Group Ref 092009</p>	<p>It is requested that the following text changes be made to Specific Local Objective 2 – Tinakilly / Newrath (SLO2), as follows:</p> <p>Change 1 <i>'Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to reduce congestion in Rathnew village centre, and to achieve good traffic circulation in the area. The RIRR shall be constructed in full by the developer from Clermont Grove to Tinakilly Park and funded in accordance with 'Appendix 3 – Infrastructure Delivery Schedule and Implementation' in full by the developer. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road. allowing for the delivery and occupation of 40% of the total residential development quantum on the zoned lands at Clermont – Tinakilly before the road is completed and operational. Any proposed development on the subject lands should be accompanied by a detailed phasing drawing and rationale to be agreed with Wicklow County Council.'</i></p> <p>In support of this change, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The bypassing of Rathnew has been a primary objective of Wicklow County Council for over 30 years as far back as the 1994 Wicklow Environs Plan, but the rationale for the Road within SLO2 downplayed its strategic importance, as it is not stated that the primary purpose of the road is to alleviate congestion caused by the traffic coming from Wicklow Town, or that new road access to Wicklow County Campus lands at Clermont will be opened and development elsewhere will be facilitated. This could have a knock on impact on WCC's ability to secure 'State' funding as per Appendix 3. ▪ Developer is a noted funding source however the cost of the road should also fall on the developer of the village centre and Wicklow County Campus. It is assumed that WCC not being listed as a funding source is in error. ▪ The scale of construction both from a time and funding prospective are significant, without phasing and allowing for the occupation of some houses, the RIRR could be delayed. ▪ Phased delivery of the RIRR was agreed with WCC under Ref. 23/60219. <p>Change 2 <i>'Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and</i> <i>Due to the upfront delivery of the Broomhall Crèche covering the entire Tinakilly development, no further crèche obligations exist within SLO 2.'</i></p> <p>In support of this change, the following grounds are raised:</p> <ul style="list-style-type: none"> - A crèche facility has been recently completed at Broomhall Business Park to cater for all childcare requirements arising from Ardale's developments in the Wicklow Town area. - The crèche places provided in this facility have not been accounted for in the Social Infrastructure Audit (Table 2.11). - Under Ref. 23/60219, it was agreed with the Wicklow County Childcare Committee that this crèche facility could cater for the childcare requirements arising from the provision of 352 No. units on the subject lands, granted by WCC. Any future applications on the lands up to 352 No. units should have childcare requirements catered for off-site by Ardale at

Broomhall Business Park.

Change 3

'Retention of the 'fairy tree' at its current location (shown with green tree symbol on map SLO 2)'

In support of this change, the following grounds are put forward:

- The tree was subject to removal under Ref. 23/60219, which was accepted by Wicklow County Council.
- An assessment of this tree was conducted by The Tree File Arborists at further information stage, which stated that there is no historic or archaeological evidence to suggest that this area of planting on the proposed development site existed prior to the 20th century.
- IAC Archaeology carried out an assessment of the history of the tree at further information stage, who concluded that no record of historic references to this tree were found, the tree is not marked as a fairy tree within historic mapping, would not have been publicly accessible as part of Tinakilly House demesne, and that it is likely that the Hawthorn tree post-dates the establishment of the demesne landscape.

It is further requested that the SLO2 – Tinakilly / Newrath **Concept Plan** be amended as follows:

Removal of the marker on the Concept Plan denoting the location of the 'fairy tree', and the amendment of the Concept Plan Layout to show residential development in the area of the site currently denoted as the location of the 'fairy tree'.

It is further requested that **Section 5 Appendix 3 Infrastructure Delivery Schedule and Implementation**, specifically the transport section, be amended to include Wicklow County Council as a funding party for the Rathnew Inner Relief Road, as follows:

In support of this change, the following grounds are raised:

- This would be a significant change in approach with negative implications for the delivery of the RIRR.
- The amendment is in line with the Framework Agreement between Wicklow County Council and the Developer.

Chief Executive Response

Delivery of the RIRR

Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure. This LPT will provide for a programme for the finalisation of the optimal route and design for the completion of the RIRR, as well as a delivery and funding programme. Wicklow County Council clearly has a role in the delivery of such important infrastructure and Appendix 3 will be amended to reflect this.

In this regard, it is recommended that the objectless of SLO2 be amended as follows:

This SLO is located in the townlands of Tinakelly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the*

existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area and to achieve good traffic circulation in the area. The RIRR shall be ~~constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road,~~ developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;

- Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and
- Retain the 'fairy tree' at its current location (shown with green tree symbol on map SLO 2).

Childcare

While it is noted that in the previous assessment of an application of the SLO2 lands, on-site childcare facilities were not required by the Planning Authority having regard to the new facility developed in Broomhall, this matter has been revaluated considered and it is considered that having regard to the Broomhall childcare location vis-a-vis SLO2, separated by major road infrastructure which would discourage access between the two location by active modes, that childcare facility should be located within SLO2.

On foot of this submission, no amendments to the LAP are recommended with regard to the provision of a childcare facility on SLO2.

Fairy Tree

While the issues rased in the submission are noted, the significance of this tree to the local community was brought to the attention of Wicklow County Council during the both assessment of a previous planning application lodged on the RN1 zoned lands on SLO2 and through the pre-draft plan consultation process. Noting there is no current live permission on these lands, it is considered that there is now an opportunity to ensure that this tree is retained and kept as a focal point as part of the future development of this site.

On foot of this submission, no amendments to the LAP are recommended with regard to the retention of the fairy tree at its current location on SLO2

Chief Executive's Recommendation

1. Include new objective in Chapter 11 Transportation Objectives as follows:

WTR - XX In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Wicklow Town – Rathnew.

2. Amend text of SLO2 as follows:

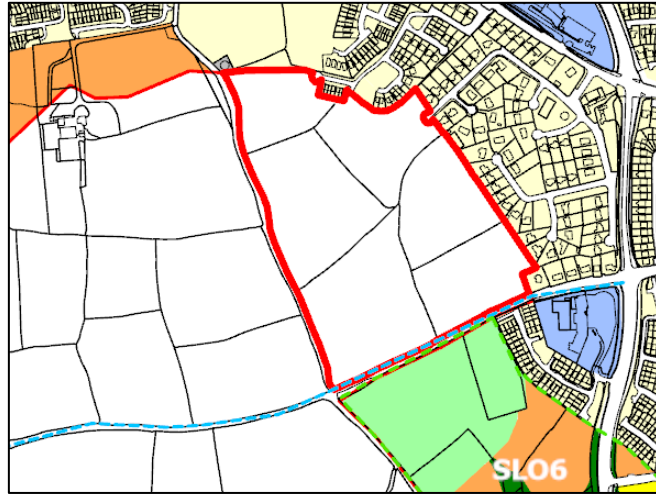
This SLO is located in the townlands of Tinakelly and Newrath. The SLO comprises New Residential (RN1), Natural Areas (OS2) and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- *Provision of the Rathnew Inner Relief Road (RIRR) to facilitate access to new developments from the existing road network, to prevent congestion in Rathnew village centre due to the development of the Clermont and Tinakilly area and to achieve good traffic circulation in the area. The RIRR shall be ~~constructed in full by the developer from Clermont Grove to Tinakilly Park. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road,~~ developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;*
- *Provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities and*
- *Retain the 'fairy tree' at its current location (shown with green tree symbol on map SLO 2).*

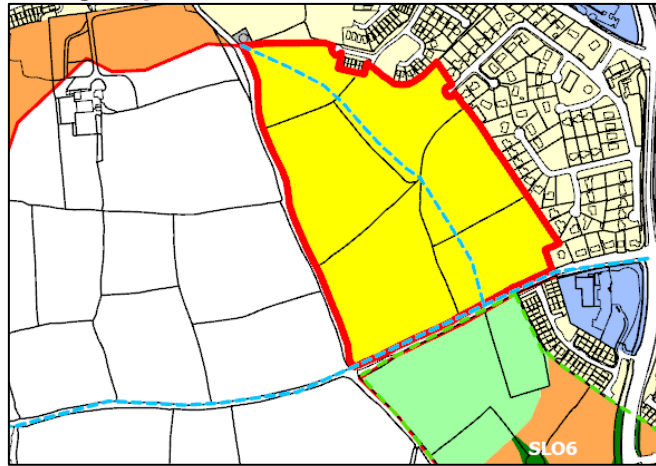
3. Amend Appendix 3 (as attached)

No.	Name	Issues Raised
114	Glenveagh Homes Ltd. Ref 112102	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that c.15.7ha of lands at Ballynerrin, outside of the settlement boundary and with no specific land use zoning, be zoned RN1 'New Residential – Priority 1'. It is further requested that a Specific Local Objective be designated on these lands, and that a road objective through the lands be included. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The zoning of the lands would allow for sufficient flexibility in the quantum of zoned land which is sequentially located to existing development and existing services. ▪ The preparation of the LAP should require an assessment of infrastructure capacity and a cost analysis of the different options and strategies for zoning, including the identification appropriate tiers of zoned land and a sequential approach in accordance with the Development Plan Guidelines. ▪ The subject lands are an appropriate location for the consolidation of Wicklow and would avoid leapfrogging in line with Objective WTR2. ▪ The entire RN2 lands are dependent on the development of 1 No. site (Tinakilly Park). Additional residential zoning on the subject lands would allow sufficient flexibility to deliver housing. ▪ The zoning of the lands for residential use back as far as 2001, which were re-designated as Strategic Land Bank in the Wicklow Town-Rathnew Development Plan 2013-2019. ▪ Planning history including previous extant permissions for some 481 No. dwellings. A Part 8 application provides for road widening and the provision of footpaths to the south of the lands. ▪ The subject lands are close to primary and secondary schools, convenience shopping, a permitted crèche, and 1.5km from the monument in the town centre. ▪ The strategic consolidation of urban development to the west of Wicklow Town in the first instance is sequentially preferable and in accordance with the sequential approach as per <i>Development Plans – Guidelines for Planning Authorities</i>, and is likely to be cost effective to service as existing cycling, footpath and road infrastructure is in place, as well as providing additional north south links. ▪ The effective use of existing infrastructure on serviced land in accordance with the proper planning and sustainable development of the area.

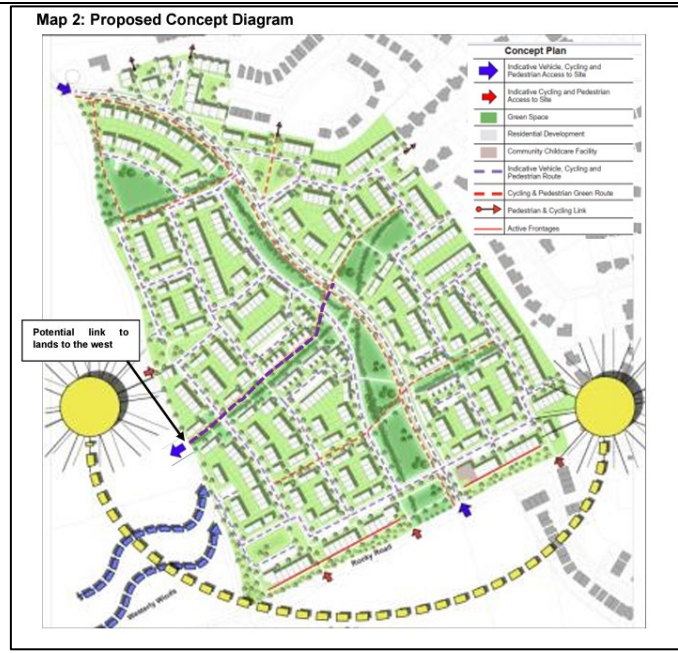
Draft Zoning:



Zoning Request:



Submitted Concept Plan for the lands:



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would

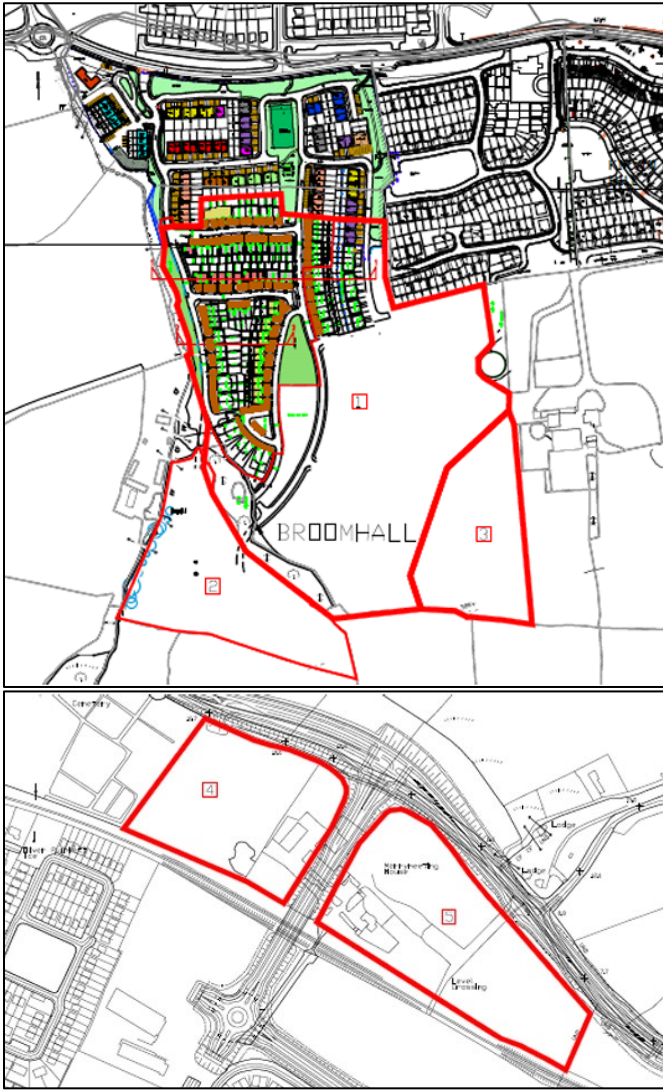
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- For the majority of the lands exceed the 80m contour in this area, which has been established in the previous plan and continued in this draft plan as the upper limit for new development having regard to visual amenity and servicing considerations. Having regard to the availability of significant lands in and surrounding the settlement at less sensitive and more easily serviced lower elevations, these lands are not considered an optimal location for the expansion of the settlement.

Therefore, the CE does not recommend the zoning of these lands for residential development.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

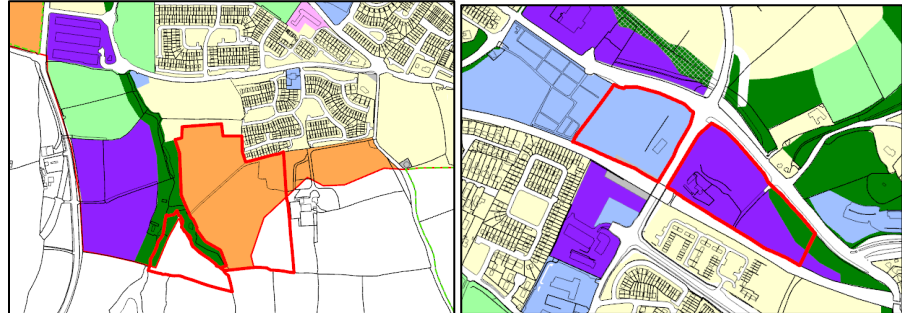
No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
115	Broomhall Estates Limited Ref 115224	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that c. 10.9ha of land at Broomhall, partially zoned RN2 'New Residential – Priority 2', OS1 'Open Space', and partially outside the settlement boundary with no specific land use zoning, be zoned RN1 'New Residential – Priority 1'.</p> <p>It is further requested that lands of c. 6.6ha at Merrymeeting, zoned CE 'Community & Education', E 'Employment', and OS1 'Open Space', be zoned RN1 'New Residential – Priority 1'.</p> <p>The sites have been labelled 1-5 as follows:</p> 

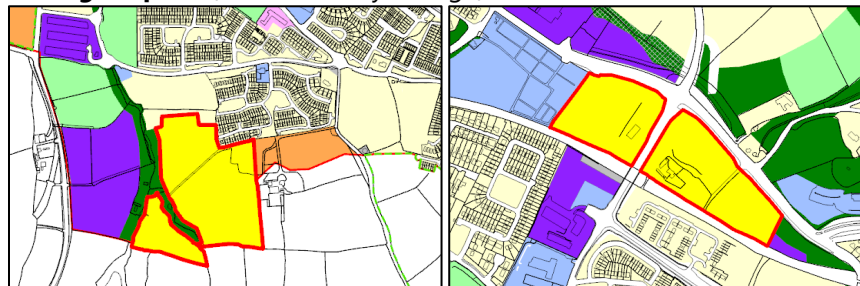
	<p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The Compact Settlement Guidelines support the logical expansion of towns and settlements. ▪ Wicklow-Rathnew is an example of a polycentric town based on the 15-minute neighbourhood concept in an urban area with a linear form provides strong policy justification to provide neighbourhood centres with critical mass for viability of services and sustainable active movement, where appropriate infrastructure has already been provided. ▪ Site 1 was previously zoned R2 'Medium Density, up to 28 units per hectare'. The RN2 'New Residential - Priority 2' zoning will only be considered after the activation of priority 1 lands and in accordance with the Core Strategy. ▪ Lands to the north of Site 1 are an active construction site of phase 1 (93 dwellings and a crèche). ▪ 12 No. dwellings are permitted by WCC on part of the lands zoned RN2 (Reg. Ref. 24/161), which should be changed to RN1 or RE to reflect the current permission. Planning applications for 97 units and a crèche have been recently submitted to WCC on the lands (reg. Ref. 24/414, 24/422). There is a significant amount of RN1 lands with no planning history or active development forthcoming. Broomhall Estates have been proactive in ensuring all of their landholding is serviced. ▪ A number of significant infrastructure elements have been provided since the initiation of Action Area 9, including the Broomhall reservoir, Wicklow Town Relief Road and Port Access Road, Broomhall Business Park, Village Mill enterprise Park (with expansion granted in 2023), Merrymeeting Neighbourhood Centre constructed by the submitter, Two 16 classroom schools constructed by the submitter. Therefore the area is already provided with good physical and socio-economic infrastructure. ▪ The lands are fully serviced and available for immediate development and therefore should not be designated as RN2 zoning, it is requested that the zoning be changed to RN1. ▪ Broomhall estates employ c. 100 workers, if development is restricted the landowners will be forced to leave the site. ▪ Site 2 was included in the Wicklow-Rathnew Development Plan 2013-2019 as Enterprise and Employment Lands. Site 3 was within the Strategic Land Bank are in that plan. The sites are logical areas for residential expansion that will not result in sprawl. Site 3 previously did not have sufficient water pressure, the provision of a water reservoir tank and water supply from the Cronroe water supply system now has enough pressure to service above the 80m contour. The area of Open Space between sites 1 and 2 will facilitate a natural amenity area for existing and future residents. No explanation is provided for the removal of the Strategic Land Bank/adjustment of LAP boundary, with Sites 1-3 located adjacent to a significant employment area at Ballinabarney. It is requested that the LAP boundary be revised to include Site 2 and 3 for residential purposes, to be consistent with Site 1. ▪ Site 4 was zoned for Enterprise and Employment in the previous LAP, and CE in the Draft Plan. There is a significant amount of community and educational facilities in the immediate proximity (350m) of the subject site. Neither draft or previous zonings are provided with justification, it is requested that the zoning be changed to residential as the lands are accessible and well serviced by social infrastructure and public transport. ▪ Site 5 was zoned Tourism/Enterprise and Employment in the previous plan, and Employment in the Draft Plan. There are lands zoned for employment
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on the western periphery easily accessible from the M11, and a parcel of Strategic Land Bank immediately inside the M11 that was removed from the Draft Plan. These alternative lands are more suitable for employment, it is requested that the subject site is zoned residential.

Draft Zoning:



Zoning Request (incl. boundary change):



Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022)

In these regards, the request for the zoning of additional land for residential use, and the requested change from RN2 to RN1 as detailed in this submission would

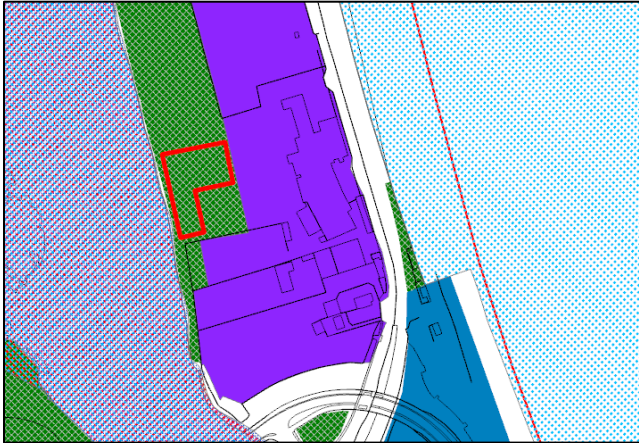
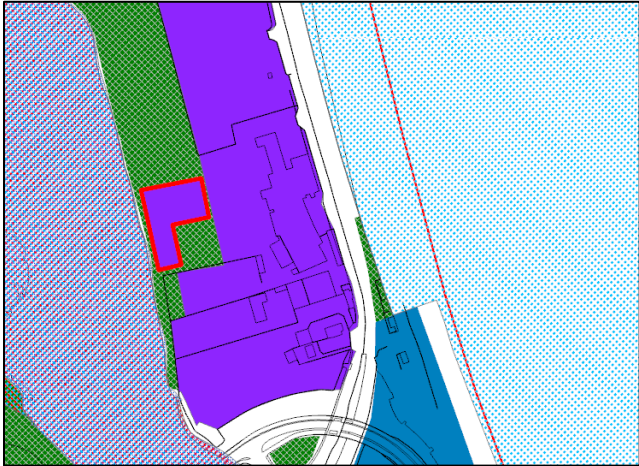
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Result in the excessive spatial expansion of the settlement and would comprise an unsustainable and unacceptable development location in respect of access to employment and public transport, consistency with sequential development patterns, consistency with Town Centre First principles, proximity to services and facilities, and the need to reduce carbon emissions.

In addition, the proposed change in zoning requested in this submission would result in a reduction in E 'Employment', CE 'Community & Education' and OS 'Open Space' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has similarly been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

Therefore, the CE does not recommend the zoning of these lands for residential development. On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
118	Multimetals Recycling Ltd. Ref 123027	<p>It is requested that lands of c. 0.37ha at Bollarney, zoned OS2 'Natural Areas', be zoned E 'Employment'. In support of this rezoning, the following grounds are put forward</p> <ul style="list-style-type: none"> ▪ The E1 'Enterprise and Employment' zoning of the lands previously. ▪ The subject lands are intended for the future expansion of the business area as well as working operations. ▪ The site is of negligible ecological value overall. ▪ The habitats presently comprise of existing building and artificial surfaces (BL3) and area of spoil and bare ground (ED2) as per the Heritage Council's 'A Guide To Habitats in Ireland'. ▪ The habitats are currently in use and subject to a high level of disturbance/heavy vehicle traffic. ▪ No rare or protected flora species are present within the site boundary or on owned land, with the only species noted within the site being the invasive <i>Buddleja davidii</i>. ▪ The site is of negligible ecological value for local fauna species, with no trees or suitable roosting / resting places / commuting / foraging for bats/badger/otter, and low value hedgerow along the western boundary. ▪ The site consists of entirely manmade, artificial surfaces that are subject to a high level of anthropogenic disturbance. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

The lands in question are zoned OS2 'Natural Areas' in the draft LAP having regard to their location vis-a-vis the adjacent European Site and its conservation objectives and sensitivities.

As detailed in the SEA Environmental Report (Section 8) that was placed on public display alongside the Draft Plan, environmental considerations have been integrated into the Draft Plan's zoning through an interdisciplinary approach. Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the various requirements set out in the higher-level NPF, Eastern and Midland RSES and Wicklow County Development Plan. The detailed Plan preparation process undertaken by the Planning Department combined with specialist input seeks to facilitate zoning that will help to avoid inappropriate development being permitted in areas of elevated sensitivity, such as in areas at risk of flooding or areas of elevated cultural/built/maritime heritage, landscape, water or ecological sensitivity.

The approach to land use zoning contained within the Draft Plan contributes towards the protection of European sites. Development objectives / zoning for lands designated as European sites is not provided for by the Draft Plan, thereby avoiding direct 'land-take' within European sites. Furthermore, where feasible, land directly adjacent to European sites is zoned so as to form a buffer zone, protecting potentially valuable ecological areas including contributing towards maintaining ecological linkage.

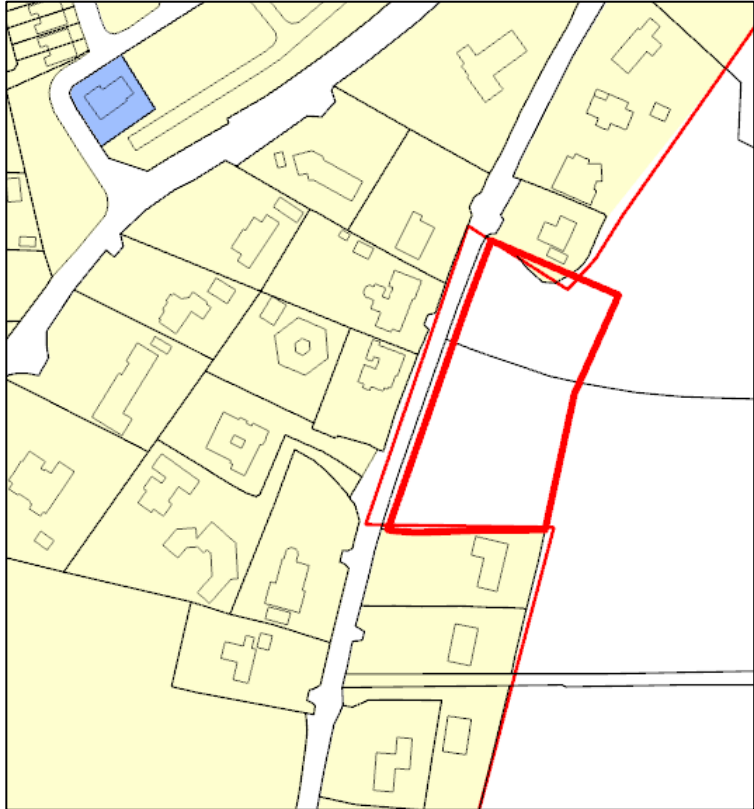
The approach to land use zoning followed for the Draft Plan remains relevant and it is recommended that the OS zoning objective at any natural/semi-natural lands remains unchanged.

With respect to the 'existing use' of the lands (yard), it should be noted that no planning permission has been granted for the current use, and has not been determined to be an 'exempted development' following a number of Section 5 requests for declaration on exemption between 2011-2016.

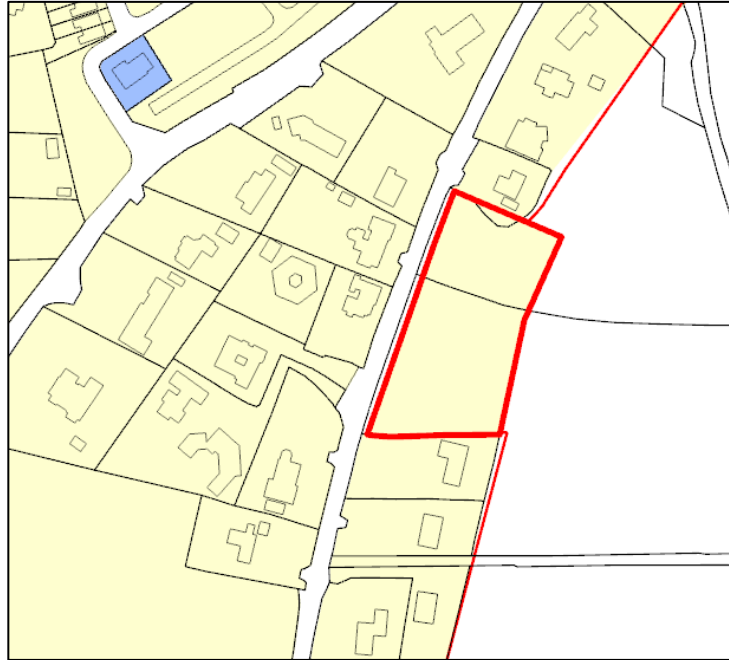
On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
120	<p data-bbox="220 237 384 300">Claire Tracey Ref 133727</p>	<p data-bbox="501 237 1453 338">It is requested that c. 0.673ha of land at Ballyguile Beg, outside of the settlement boundary with no specific land use zoning, be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are put forward:</p> <ul data-bbox="501 342 1453 936" style="list-style-type: none"> <li data-bbox="501 342 1453 510">▪ Agreement has been reached with Neville Developments allowing for the removal of the existing trees and ditch along the subject land's boundary, to provide a replacement ditch embankment, two designated entry points into the subject lands, and a compliance objective of a 1.5m footpath to Avondale Manor. <li data-bbox="501 515 1453 683">▪ Connection to existing services is very feasible at the existing foul main exiting service in place to serve Avondale Manor. Foul sewer pipe and surface water pipe are in proximity. The zoning of the lands would make efficient use of serviceable lands/existing infrastructure/promote infill development/respect the existing built fabric. <li data-bbox="501 687 1453 757">▪ An established pattern of both one-off housing and larger residential developments. <li data-bbox="501 761 1453 898">▪ The Draft LAP promotes infill development, which are encouraged in RE 'Existing Residential' areas. The subject lands are ideally suited for RE 'Existing Residential' zoning, offering a small number of detached bungalow-style homes, a flexible housing option. <li data-bbox="501 902 1453 936">▪ The proposal aligns with the core objective of Housing for All. <p data-bbox="501 976 671 1010">Draft Zoning:</p> 

Zoning Request (incl. boundary change):



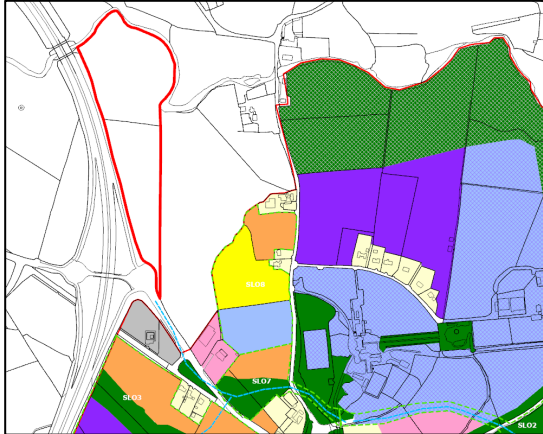
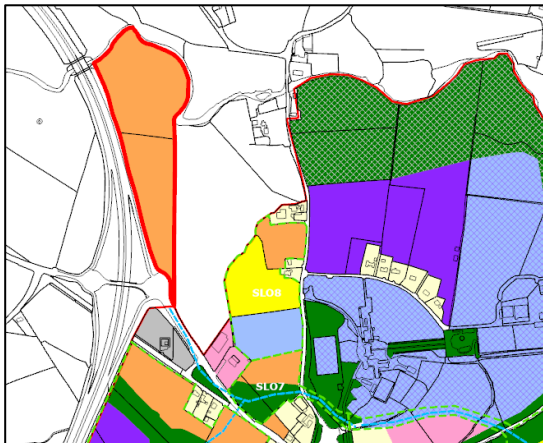
Chief Executive Response

The draft plan boundary at this location is intended to follow the boundary of existing developed lands, and as these lands are not developed, they are not included. This is in order to manage the spatial expansion of the settlement, particularly in peripheral and visually elevated areas, such as this. It is noted that there have been no applications for permission on these lands since 1996-97, when permission was refused, nor recent pre-planning inquiries.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
131	John Wilding	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>It is requested that lands of c. 8.62ha at Rosanna Lower, outside the settlement boundary and with no specific land use zoning, be zoned for residential development and included within the boundary. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ It would be in the interests of proper planning and sustainable development that the subject lands be zoned residential development in the Wicklow Town-Rathnew Development Plan. ▪ The subject lands have good access to all public services inclusive of roads, drainage, water supply, outside any potential flood risk zone. ▪ They adjoin residential development and are in close proximity to the local centres of Rathnew Village and Wicklow Town. ▪ Wicklow Town is a Level 2 Large Growth Town II where the consolidation of future development should be prioritised. <p>Draft Zoning:</p>  <p>Zoning Request (incl. boundary change) [the phasing of the requested residential zoning was not specified, the below map illustrates the request as RN2 'New Residential – Priority 2']:</p> 

Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

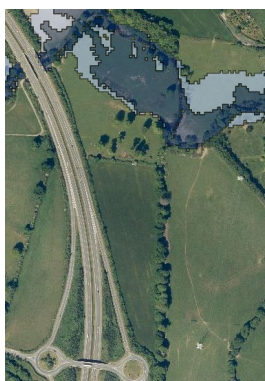
- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

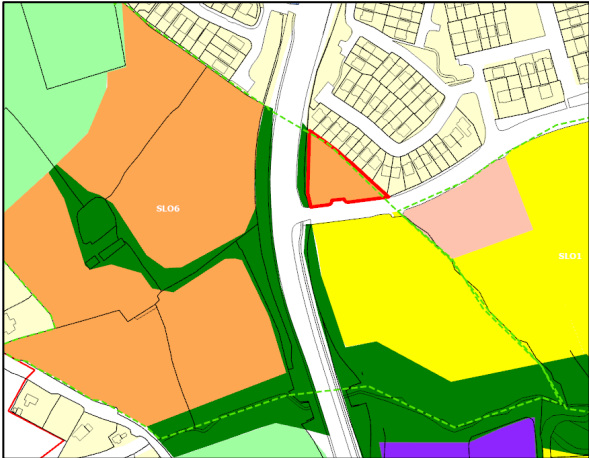
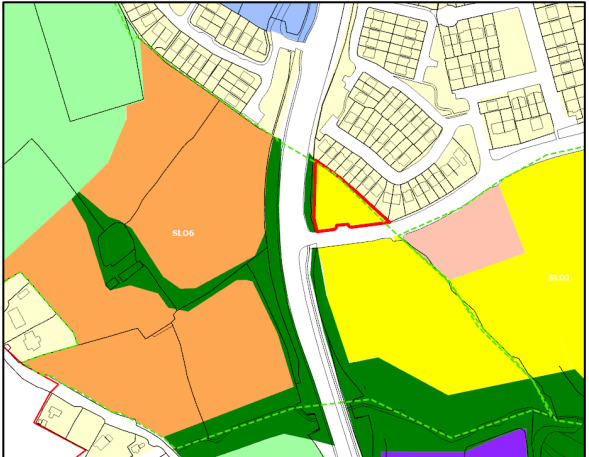
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Result in the significant extension and sprawl of the settlement into the unzoned countryside surrounding the settlement and comprise unacceptable 'leapfrogging' given the existence of other unzoned lands between the site and the plan boundary.
- Likely require access off the M11 or an associated roundabout which is contrary to '*Spatial Planning and National Road – Guidelines for Planning Authorities*'.
- Provide for residential development within 100m of the national road, which is precluded by the provisions of the Wicklow County Development Plan.
- Entail residential zoning in an area identified as at risk of flooding (see flood risk map below)



Therefore the CE does not recommend that zoning of these lands, and on foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
136	Anne Car Ref 161906	<p>It is requested that lands of c. 0.2ha at Ballynerrin, zoned RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The owner intends to dispose of two areas of zoned land together due to liability/exposure to Capital Acquisitions Tax and Residential Zoned Land Tax. ▪ The subject lands are strategically located near each other and benefit from a designated entry/exit point off the newly completed link road connecting Marlon Road and Hawkstown Road. ▪ The lands have access to all required utility services, making both sites ideally suited for immediate development and an excellent opportunity for developers seeking strategically located development. ▪ This subject site is a very small quantum of land, and its inclusion as Priority 1 will have little to no impact on the overall objectives of the proposed 2025 LAP. ▪ Reclassifying this parcel will facilitate an orderly disposal of all lands located on the Wicklow Town side of Hawkstown Road as a single lot. <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

Chief Executive Response

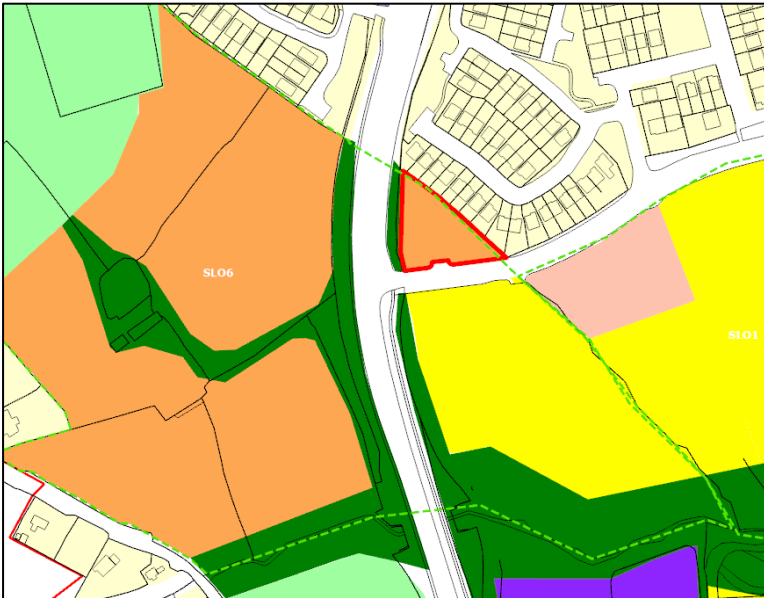
This request is considered reasonable given the location of the lands in question, within the boundary formed by the Hawkstown Road. Given the small, infill nature of these lands in the built up part of the settlement, it is not considered that a material breach of the Core Strategy would arise from this change.

Chief Executive's Recommendation

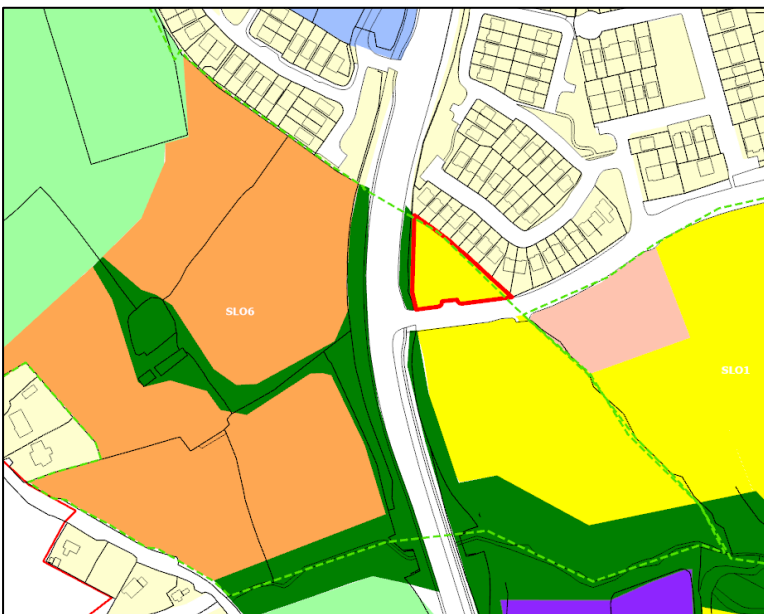
CE Recommendation X

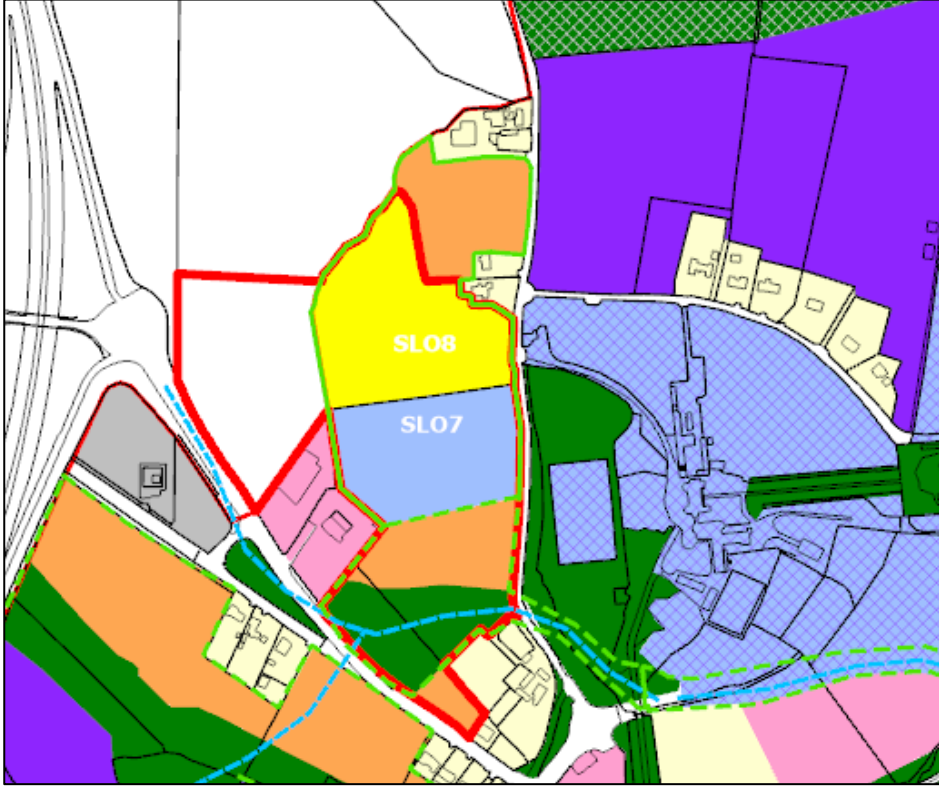
Amend land use zoning map as follows:

Draft LAP:

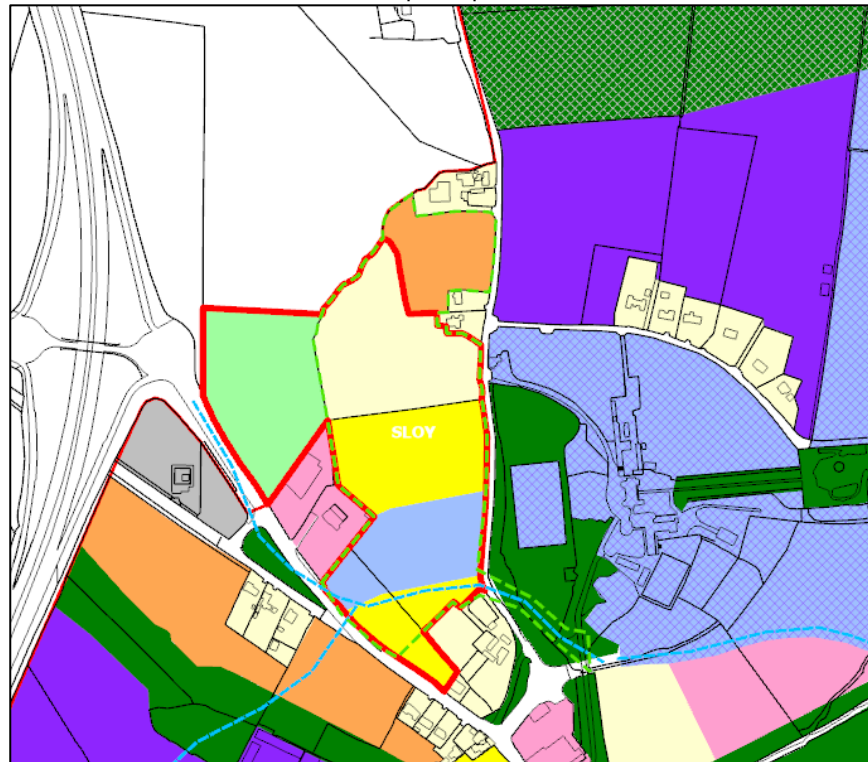


CE Recommendation:



No.	Name	Issues Raised
141	The Clarke Family & Rycroft RW Ltd. Ref 165650	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report; issues raised with respect to plan phasing / prioritising provisions are addressed under Section 4.2.3.1 of this report of this report; issues around school provision principle are addressed under Chapter 7 Community Development, Section 4.3.6.1 and Section 4.3.11 Appendix 2 Social Infrastructure Audit of this report of this report.</p> <p>This submission relates to lands at Rosanna Lower, north of Rathnew. It is requested that</p> <ul style="list-style-type: none"> ▪ lands of c. 1.1ha at Rosanna Lower, zoned RN2 in the draft plan, be zoned CE 'Community & Education' ▪ lands of c. 2ha at Rosanna Lower, zoned CE 'Community & Education', be zoned RN1 'New Residential – Priority 1'. ▪ lands of c. 2.6ha at Rosanna Lower, zoned RN1 'New Residential – Priority 1', be zoned RE 'Existing Residential'. ▪ lands of c. 1.2ha at Rosanna Lower, zoned OS1, be zoned CE 'Community & Education' and RN1 'New Residential – Priority 1'. ▪ lands of c. 2.5ha at Rosanna Lower, outside the settlement boundary and with no specific land use zoning, be for a Community Sports Campus. ▪ that SLO7 and SLO8 be amalgamated. <p>Draft Zoning:</p> 

Zoning Request [the request for lands for a 'Community Sports Campus' is illustrated below as AOS 'Active Open Space']:



In support of these changes, the following grounds are raised:

- It is intended to deliver family homes as well as the intended primary school and the new Inner Relief Road, as well as promoting a new sports campus in a sustainable matter for Rathnew. In this regard, the submission identifies lands that landowner could offer to Wicklow County Council lands for the purposes of providing a significant sports campus beside the proposed Rathnew Inner Relief Road, proposed primary school, close to the centre of Rathnew.
- A more logical arrangement of the zoning objectives of these lands could be achieved, which would thus require the SLOs to be amalgamated.
- The Draft CE zoning of c. 2ha is situated outside the indicative route of the RIRR, disconnecting the school from the village centre and potentially creating a traffic and public safety hazard. The quantum of land zoned CE seems excessive. It is proposed to move the CE land south to adjoin the RIRR.
- The Draft CE zoning could then be rezoned to RN1 'New Residential – Priority 1'. This would connect into the existing residential zoned lands currently under construction.
- Rezone RN1 lands to RE 'Existing Residential' as the lands are currently under construction under WCC Reg. Ref. 23/854. The rezoning should require the designation of alternative lands for RN1 'New Residential – Priority 1'.
- The quality and usability of Draft OS1 lands would be compromised by the delivery of the RIRR, dissecting the lands. The rationale for OS1 lands at this location is unclear, with no specific environmental/ecological designation. It would appear to be an unsustainable use of serviceable land within the centre of Rathnew. With lands north of the RIRR rezoned to CE 'Community

	<p>& Education’ and lands south of the RIRR rezoned RN1 ‘New Residential – Priority 1’, open space can be provided in this location as part of residential development as per development management guidance, i.e. up to 15% of site area.</p> <ul style="list-style-type: none"> ▪ The proposed lands for a Sports Campus could replicate the Shoreline Sports Centre in Greystones, and could also be used by the new school and growing population. ▪ In relation to population allocation and quantum of residential zoned lands, it is requested that RE ‘Existing Residential’ zoning be applied to sites where residential development has commenced or planning permission for residential has recently been granted and expected to commence/be completed before the adoption of the LAP. The rezoning of CE/RN2 lands to RN1 will result in no net loss of RN1 lands across the LAP area. ▪ The LAP Transport Assessment displays the 10-minute walking distance isochrones map of primary schools in Wicklow Town-Rathnew. Relocating the CE zoning as proposed would bring a large area of the catchment within a 10-minute walking distance to a school and would be in accordance with the ‘optimal locations’ identified in the Draft LAP’s Transport Assessment.
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines ‘Development Plans – Guidelines for Planning Authorities’ (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

In addition, the draft plan has made provision for the delivery of essential infrastructure, including (but not limited to) new transportation and social infrastructure, such as the RIRR and new school sites. In this regard, the zoning provisions for this area have been carefully calibrated taking the following into account:

- Core Strategy residential zoning requirements, including likely longer term zoning requirements, to ensure consistency with the Wicklow County Development Plan;
- The strategic need complete the RIRR between the R761 and the R772; while the design of this route has not been finalised, it is most likely to pass through the area that the draft plan shows as OS1. This provides for a clear corridor for the route options for this connection, and it is essential that this be reserved during the lifetime of this plan, when the final route will be determined.
- Recommendations for school sites as provided by the Department of Education.

With regard to the submission, the suggestion that the lands proposed for OS1 zoning be instead zoned for

residential and school use could seriously impact on the delivery of both of these uses, including rendering the school site undevelopable, depending on where the final route of the RIRR is identified. In addition, given the most likely location of the road, the future school site will required to be north of the road, and therefore the reasoning behind the zoning change suggested (i.e. to the move the CE zoning southwards) is not sound and would result in a school site being closer to a main road, which is not considered optimal.

With respect to the suggested AOS zoning, there are concerns regarding (a) the peripherality of this suggested sports zone vis-a-vis the majority of the population and (b) how access to such a sports ground could be facilitated given the location of the lands adjoining the M11 interchange. Other than access via the suggested residential zones, access would likely be only feasible off the M11 roundabout which is contrary to 'Spatial Planning and National Road – Guidelines for Planning Authorities'.

With respect to the request that lands that are currently in development be amended from RN1 to RE – this is considered a reasonable request

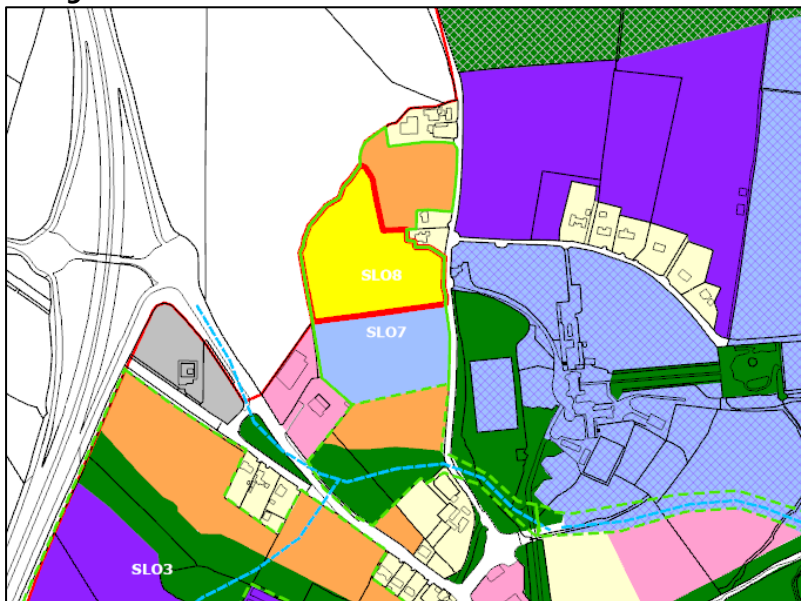
Chief Executive's Recommendation

1. Amend SLO7 as follows:

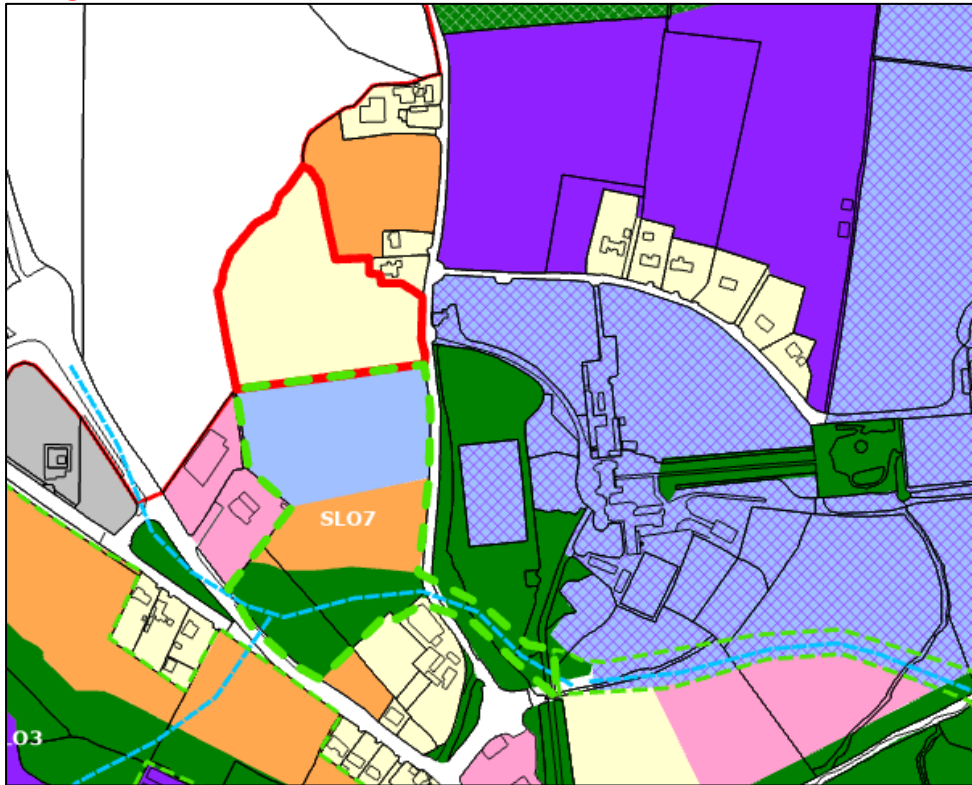
This SLO is located in the townland of Rosanna Lower. The SLO comprises New Residential (RN2), **Community & Education (CE)** and Open Space (OS1) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

- **Lands zoned CE shall be reserved for future school use and shall not be developed for any other CE use during the lifetime of this plan.**
- ~~Provision of the Rathnew Inner Relief Road (RIRR). The RIRR shall be constructed in full by the developer Any design shall make provision for the completion of the RIRR from Clermont Grove to the R750 at the Maxol Garage. The delivery of the RIRR may be on a phased basis, but no dwelling within the SLO may be occupied until the full completion and operation of the road. The RIRR shall be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;~~
- No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752 **as set out in the future Wicklow Town – Rathnew Local Transport Plan;**

Change from:



Change to:

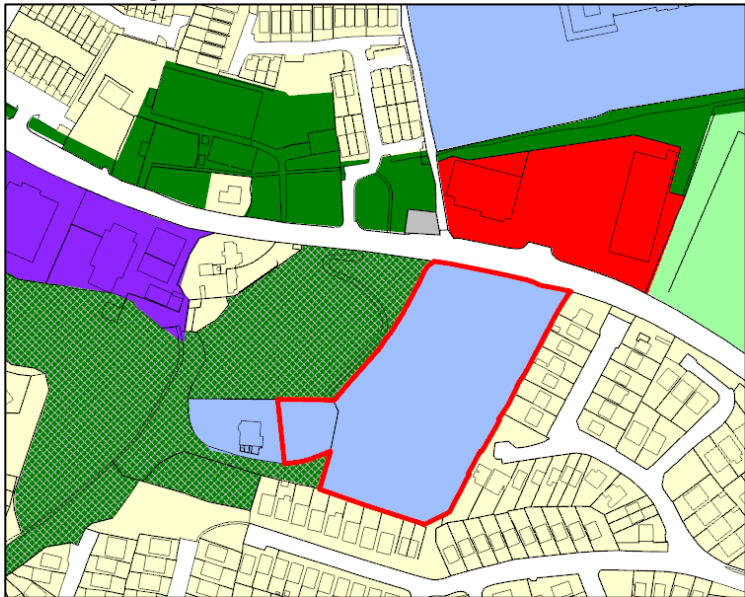
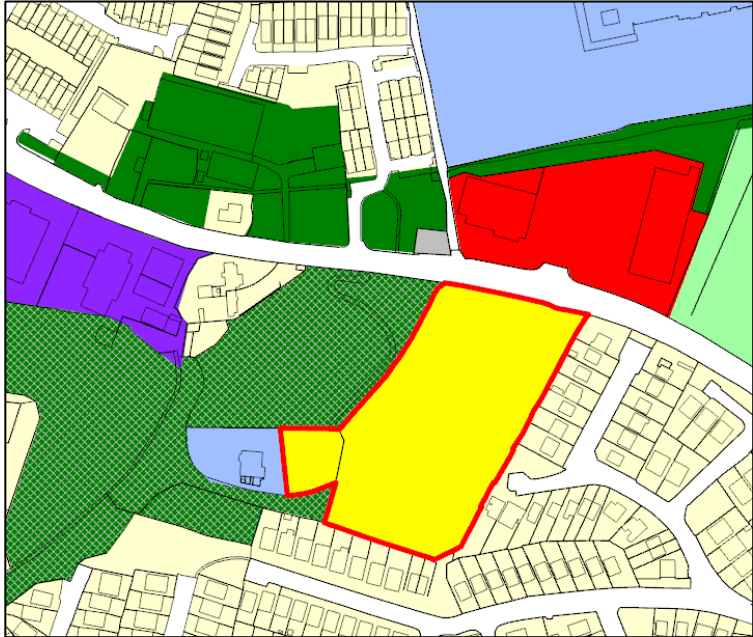


2. Amend SLO8 as follows:

Delete SLO8 map and text

~~This SLO is located in the townland of Rosanna Lower. The SLO comprises New Residential (RN1), New Residential (RN2) and Community & Education (CE) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:~~

- ~~▪ Lands zoned CE shall be reserved for future educational use and shall not be developed for any other CE use during the lifetime of this plan.~~

No.	Name	Issues Raised
142	The Delahunt Family Ref 133706	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning. This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report.</p> <p>It is requested that lands of c. 1.6ha of lands at Glebe (the former Girl Guides site), zoned CE 'Community & Education', be zoned RN1 'New Residential – Priority 1'. It is further requested that the subject lands are removed from the list of sites initially identified for the delivery of schools (LAP page 49 and Appendix 2, Table 2.10). In support of this rezoning, the following grounds are put forward:</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

		<ul style="list-style-type: none"> ▪ In recent years there has been a fire and the house has remained derelict ever since, the family consider it a matter of huge importance that the potential of this strategic property is fully realised. Fernhill House is not included on the Record of Protected Structures or list on the National Inventory of Architectural Heritage. A Tree Preservation Order covers parts of the lands. ▪ The submission is accompanied by a Feasibility Scheme and Design Note, Traffic and Transport Appraisal, Engineering Services Report, and Arboricultural Report, which should be read in conjunction with same. ▪ A residential and community development has been suggested for the site, with land around Fernhill House proposed for community and education use. Residential development of 61 units, where building heights have been suggested with consideration to site levels and adjoining properties, with a mix of housing types. ▪ The site is 800m from Wicklow Railway Station, where planned high capacity services include the extension of the DART. ▪ New access to the site proposed 100m east of existing access, with new pedestrian crossing proposed between the site and Lidl/SportsDirect. The design has taken into account the recommendations of the Local Transport Assessment with respect to R750 Dublin Road (Segment 2) and allows potential set back. ▪ The site can be serviced by water infrastructure; there is no risk of flooding on the subject lands. ▪ The subject lands are unlikely to be appropriate for the delivery of a school, with rising contours making a development with a large footprint difficult. The lands do not lend themselves to large outdoor play areas, are located less than 100m from an existing post-primary school and c. 650m from an existing primary school and would be thus an inefficient use of resources. Of the 7 sites identified in the Draft LAP, 3 sites (excluding the subject lands) have been selected for the delivery of new schools through the spatial analysis of existing schools and existing and future residential development, and a detailed Transport Assessment. The shortfall in capacity by 2031 (234 primary school places and 38 secondary school places) is likely to be easily absorbed by the delivery on the 3 designated school sites.
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would

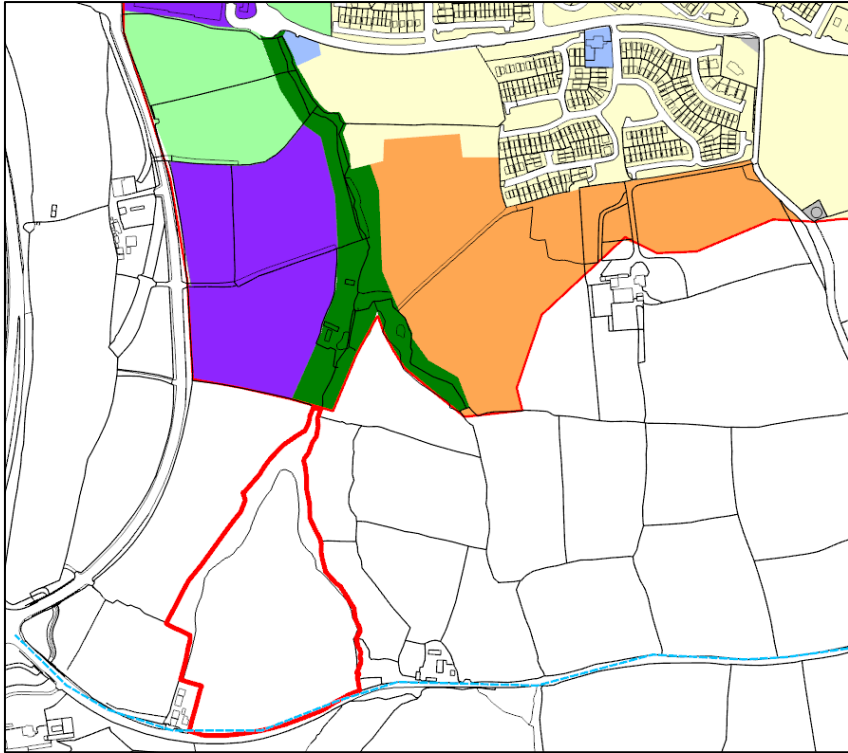
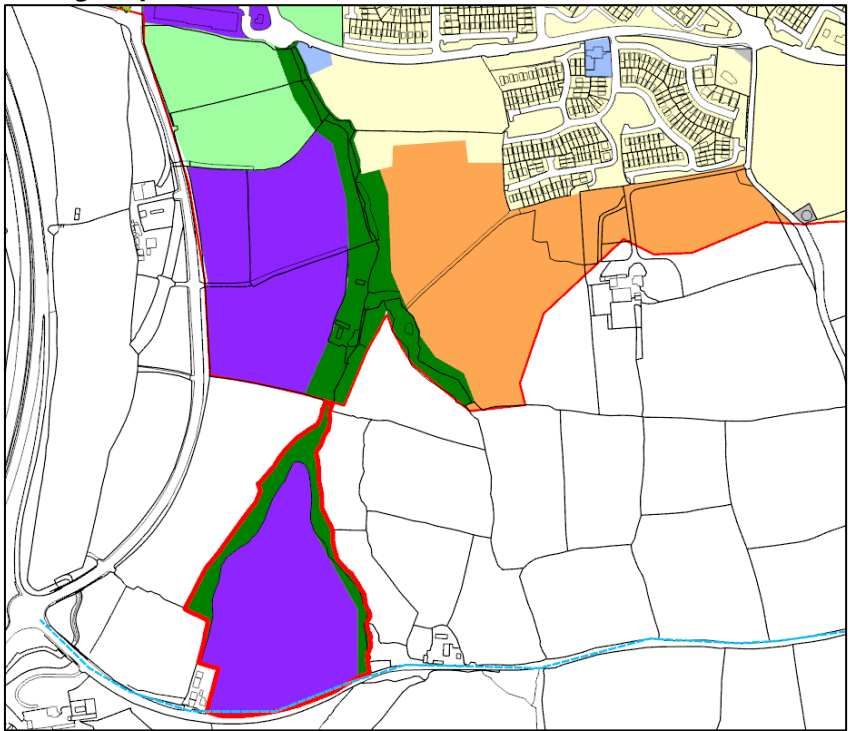
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Result in a reduction in CE 'Community & Education' zoned lands. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles. It should be noted that CE zones are not identified or so zoned solely for the potential development of new schools; a range of social and community infrastructure is required to support any growing settlement.

Therefore, the CE does not recommend the zoning of these lands for residential development.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
146	Lusra Teo Ref 182907	<p>It is requested the c. 5.3ha of land at Ballynabarny, outside the settlement boundary and with no specific land use zoning, be zoned E 'Employment'. It is further requested that c. 1.4ha of land at Ballynabarny, outside the settlement boundary and with no specific land use zoning, be zoned OS1 'Open Space'.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

	<p>This submission puts forward a number of points in support of this rezoning of this site to Employment including the following:</p> <ul style="list-style-type: none"> ▪ The submitters are active developers of residential and employment lands in Wicklow Town-Rathnew. ▪ A permitted larger enterprise centre under WCC Reg. Ref. 22/1269, including footpath, will abut the subject lands. ▪ The subject lands were included in the Strategic Land Bank of the Wicklow Town-Rathnew Development 2013-2019. ▪ Wicklow-Rathnew is a Level 2 'Key Town' and a major employment hub in the County. This is further supported by Chapter 9 of the Wicklow County Development Plan 2022-2028 and the County Wicklow Commuter Study from 2019.. ▪ The 2015 Wicklow Socio-Economic Profile report provided a profile of Wicklow-Rathnew, with considerable outward and inward commuting. ▪ It is an objective, WTR8, of the draft plan <i>'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.'</i> ▪ The subject lands are conveniently located for access to the M11 to the west and the urban areas of Rathnew and Wicklow to the north and east. ▪ The lands are well served by existing road infrastructure and provide a natural expansion of the existing employment uses. ▪ This site would allow for the further expansion of an area of the OS2 space as indicated in the draft Lap to the north. <p>A separate submission for Lusra Teo land in the Marlton area has been prepared requesting employment lands to be rezoned for residential development. It is pit forward that the relocation of employment lands to the subject lands (of a similar area) would result in a similar quantum of overall lands zoned employment within the LAP boundary.</p>
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Chief Executive Response

The provisions of the draft plan, including employment zoning provisions, have been developed to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives including the employment supporting objectives;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being

identified for new residential development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

In these regards, the request for the zoning of additional land for employment use as detailed in this submission would comprise significant extension and sprawl of the settlement into the unzoned countryside surrounding the settlement; comprise unacceptable 'leapfrogging' given the existence of other unzoned lands between the site and the plan boundary and would therefore contravene compact and sustainable growth principles; and would result in a car dependent employment zone having regard to the lack of active travel infrastructure and public transportation services in this area;

The CE is satisfied that ample provision is made for new employment zoned land in the draft plan and therefore the zoning of this land for such use is not an essential need in order for Wicklow Town – Rathnew to meet its enterprise and employment goals as set out in the RSES, LECP and County Development Plan.

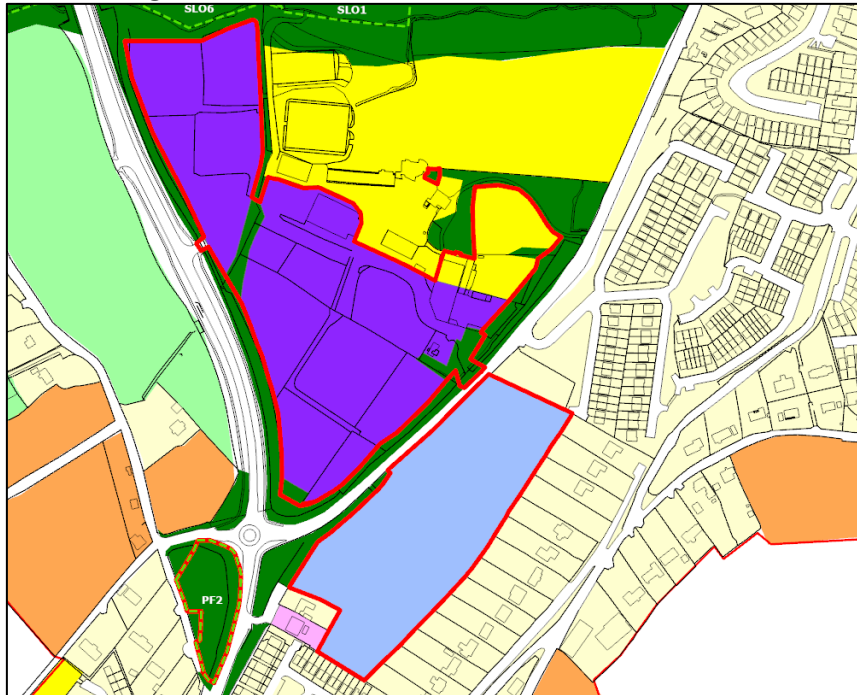
Therefore the CE does not recommend that zoning of these lands, and on foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

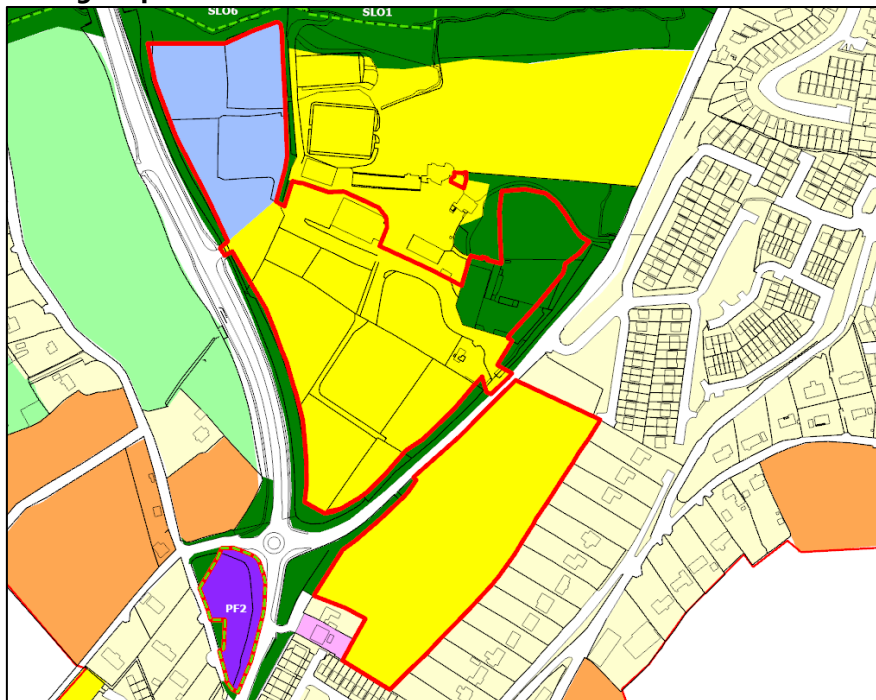
No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
147	Lusra Teo Ref 183127	<p>This submission relates to lands at Marlton - Ballynerrin Lower. A number of zoning changes are requested as follows:</p> <p>Change 1 : Rezoned c. 4.26 ha of 'E – Employment' lands to RN1 use for the following reasons:</p> <ul style="list-style-type: none"> ▪ The existing employment land in the northwest sector at Ballybeg, Broomhall and Ballynabarny, should be consolidated instead. ▪ This location is unsuitable for employment use due to high volumes of HGV traffic it would generate in a predominantly residential neighbourhood, close to Wicklow town centre, TRR, link road, proposed AOS, and schools. ▪ A separate submission by Lusra Teo requests that a similar area of land at Ballynabarny be zoned for employment to rebalance employment provision in the WRLAP area. ▪ The lands are located naturally adjacent to and within walking distance to existing residential, schools, parkland, town centre, public transport, Marlton River Line Park and requested CE zonings in the same ownership. <p>Change 2: Rezone c. 2.3 ha of 'E – Employment' lands to CE use for the following reason:</p> <ul style="list-style-type: none"> ▪ This site meets all the DES Site Suitability Assessment (SSA) guidelines, is adjacent to the Marlton Stream Riverwalk Park, opposite AOS lands in WCC ownership. <p>Change 3: Rezone c. 0.7 ha of 'R1 – new Residential (Phase 1)' lands to OS1</p> <ul style="list-style-type: none"> ▪ The site is a former landscaped private parkland area and is designated OS based on an arboricultural assessment and its potential for instatement as a public park. ▪ Existing large agricultural buildings can be converted into indoor active and passive recreation. <p>Change 4: Rezone c. 3.5 ha of CE lands to RN1 use for the following reason:</p> <ul style="list-style-type: none"> ▪ The land profile and access is unsuitable for school use and does not meet suitability criteria with reference to DES Technical Guidance Document TGD-025. <p>Change 5: Rezone c. 0.5 ha of OS1 lands to 'service station' use for the following reasons:</p> <ul style="list-style-type: none"> ▪ The previous zoning of the lands. ▪ The lands are an ideal location adjoining the Hawkstown roundabout, R751 Ashtown Lane, the TRR. ▪ A critical mass of residential developments is coming on-stream increasing the potential viability of the service station so as to attract several interested parties. ▪ This isolated OS site has little practical suitability for recreation and is an island surrounded by busy roads and is inaccessible and unsafe for use as Open Space. No explanation is given for the OS designation.

Draft Zoning:



Zoning Request:



Chief Executive Response

The provisions of the draft plan, including residential, employment, education and open space zoning provisions, have been developed to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives in particular consistency with the Wicklow Core Strategy and including the employment supporting objectives;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of suitable land. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices (including Social Infrastructure Audit and Strategic Flood Risk Assessment). This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential and employment development while protecting areas of biodiversity value and avoiding areas at risk of flooding.

With respect to the request for the re-zoning of c. 7.75ha of lands from 'E – Employment' and 'CE – community, education etc' use to residential use, as detailed in this submission, this would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

With respect to the request to change c. 6.5ha from 'E – Employment' use to other uses (including residential and CE), particularly on the basis that employment development could be provided elsewhere at the very periphery of the settlement, this is not supported as this would run contrary to compact growth and sustainable development principles, which provide that the wide range of uses that are essential in a settlement, including employment uses, should be as close to and as accessible as possible by active and sustainable transport modes to where the population reside.

With respect to the request to change 3.5ha of CE lands to residential use, it is not agreed that these lands may not be suitable for future school use. The alternative suggested – a site of 2.3ha - would be significantly undersized to accommodate a new secondary school, which the SIA and Transport Assessment carried out clearly show is needed in this area. Therefore this change is not supported.

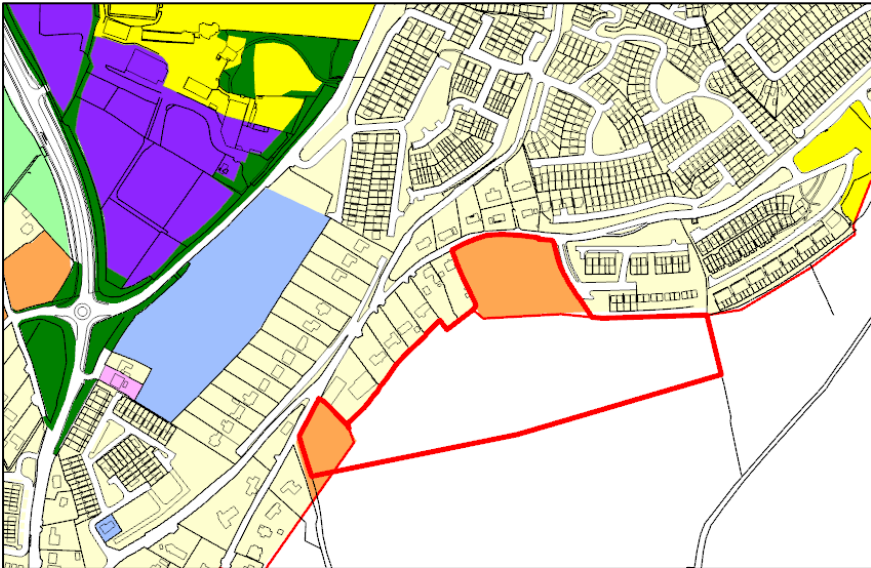
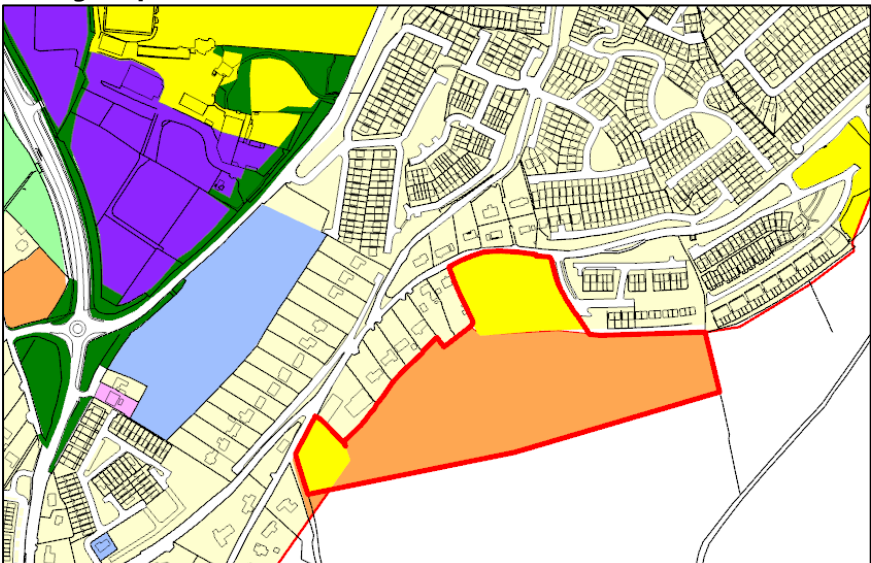
The CE has no objection to the suggested change of 0.7ha of RN1 to OS as suggested, although it is assumed this is only on the basis of the other changes set out and is not a 'stand alone' suggestion.

Finally, with regard to the request to change OS lands to 'service station' use, as part of the overall review of the previous plan, a review has been carried out of GI assets (trees, hedgerows, watercourses, natural areas etc) through the plan area, in order to fulfil the County Development Plan biodiversity and nature enhancement objectives. This assessment found that the lands surrounding this roundabout, including these subject lands, have mature trees, natural re-vegetated areas and significant biodiversity potential. In addition, notwithstanding the zoning of these lands for some time for service station use no applications have been made for such development and it is unclear why now it is desired. Therefore the change is not supported.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
148	Clouddale Ltd. Ref 182429	<p>A range of issues are set out in this submission; the assessment below addresses only the request for changes in zoning.</p> <p>This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.</p> <p>It is requested that lands of c. 1.8ha at Ballyguile, zoned RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. It is further requested that lands of c. 5.9ha at Ballyguile, outside the settlement boundary and with no specific land use zoning, be zoned RN2 'New Residential – Priority 2' and included within the settlement boundary as per the Wicklow Town-Rathnew Development Plan 2013-2019.</p> <p>Draft Zoning:</p>  <p>Zoning Request:</p> 

	<p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ 'Development Plans – Guidelines for Planning Authorities' indicates that zoned serviced land should not be subject to rezoning. ▪ The Draft LAP has de-prioritised lands at Ballyguile (with established planning permissions under Reg. Ref. 21/84, 21/230, 15/595) to Priority 2 which undermines previous planning assessments (including ABP decisions) that the lands are suitable for residential development. ▪ The draft LAP proposes to change the settlement boundary with an arbitrary cut-off that regards all lands outside as "rural". Submitted that some of these lands (including those at Ballyguile) are highly suitable for the next phase of development as the town grows. ▪ The Wicklow Town and Rathnew 2013 settlement boundary should be retained in the new draft LAP as previous lands identified this Strategic Land Bank within the potential built envelope of the settlement could be considered for detailed zoning and development after 2019. ▪ The Clouddale lands are serviced, have road frontage and public transport access as well social infrastructure in the south of Wicklow Town. ▪ The lands consolidate the built-up area of Ballyguile and are effectively an infill greenfield site, set amongst an existing neighbourhood. ▪ Noting Section 6.3.4 of the County Plan on phasing, the site does not 'leapfrog' existing sites, presents an infill opportunities and better use of under-utilised land, and comprises an area which adjoins existing developed areas. ▪ Submitted that site should be brought into RH1 Priority 1 zoning designation, with the wider land holding defined as RH2 Priority 2 Residential lands.
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Chief Executive Response

The residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use, and the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Exceed the 105m contour in this area, which is the highest elevation of any development permitted on this

dominant landmark hillside, which has been established in the previous plan and continued in this draft plan as the upper limit for new development having regard to visual amenity and servicing considerations. Having regard to the availability of significant lands in and surrounding the settlement at less sensitive and more easily serviced lower elevations, these lands are not considered an optimal location for the expansion of the settlement.

Therefore, the CE does not recommend the zoning of these lands for residential development.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

No.	Name	Issues Raised
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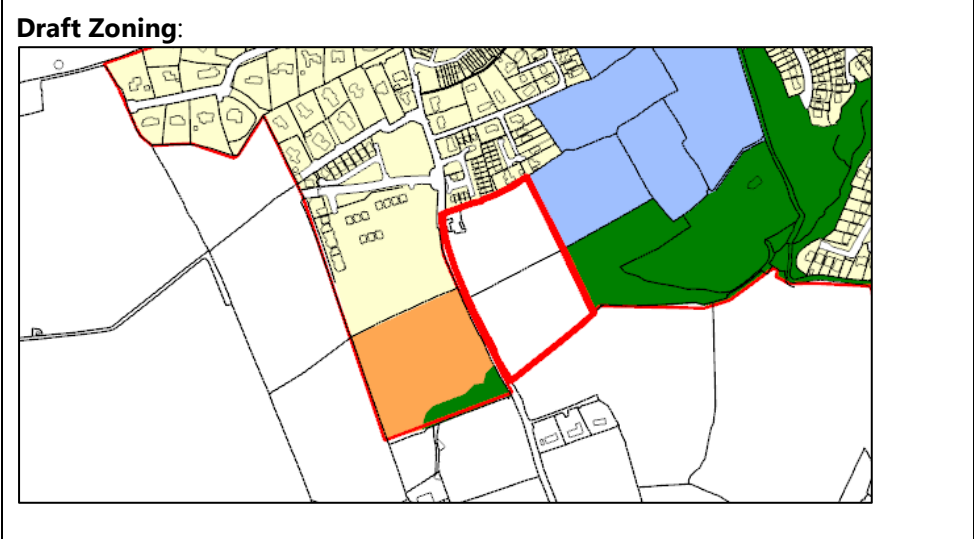
The following three submissions Nos. 154, 155, and 156 from the one landowner, **Ronan O’Caoimh**, were accompanied by a cover letter which outlines the following:

- The proposed LAP all but wipes out the development potential across the land in the same ownership in the area.
- The rezoning proposals for three sites is peculiar, particularly as there is a housing crisis.
- The landowner has lived in Co. Wicklow for 30 years and is heavily invested in the development of the county.
- Since purchase, the sites under the submitter’s ownership have gone from being fully zoned for residential housing, to Strategic Land Bank, to de-zoned, despite the three sites being within the LAP boundary or CSO boundary, having established connection points for services or are serviced, are accessed via existing roads.
- These characteristics are why the sites were purchased. It is not unreasonable to expect lands with such compelling characteristics to retain their zoning or improve over a twenty year period.
- 10 acres at Greenhill Road have been carved out of the LAP boundary to create a peninsula of unzoned land, despite being bordered by existing/zoned land, being serviced, with new footpaths put in by WCC this year. Similarly, the Dunbur Lower land wraps around the existing taken-in-charge Seacliff development and has ready to go services and access.
- A table is included indicating the changes in zoning status on the lands over the last c. 20 years.
- It is not believed that the urgent need for delivery of housing on sites that are ready to go is being given enough weight.
- Lowick Homes has a track record of delivering housing and would deliver housing on the lands immediately.
- It seems short-sighted not to take the opportunity to include more residentially zoned land when the current population projections do not reflect the reality on the ground.
- Wicklow Town may miss the opportunity to prosper by de-zoning lands within a 10-minute walk of the town centre.

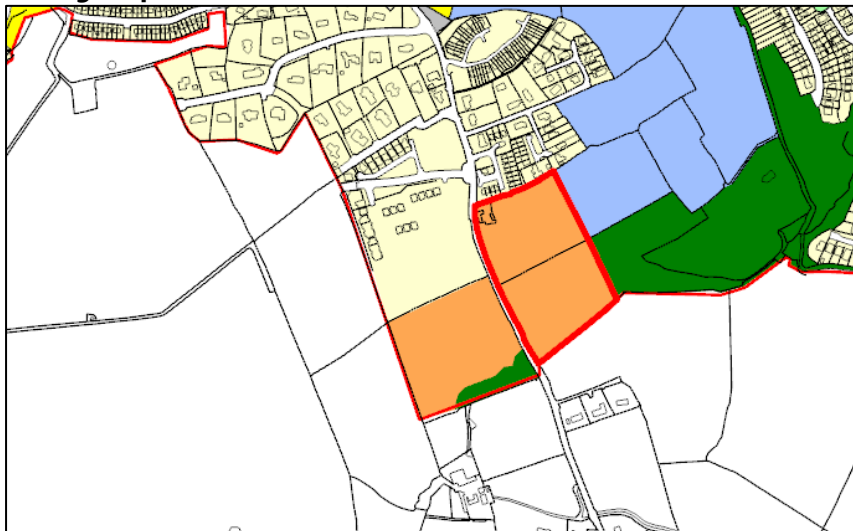
This submission also raises issues with respect to Core Strategy and housing targets which are addressed under Chapter 3, Section 4.3.2.1 of this report. Issues also raised with respect to plan phasing / prioritising provisions, including Objective WTR4 which are also addressed in Chapter 3, Section 4.2.3.1 of this report.

154 [Ronan O’Caoimh](#)
[Ref 194856](#)

It is requested that c. 4ha of land at Greenhills Road, Corporation Lands, outside of the settlement boundary and without a specific land use zoning, be zoned for residential development, with the cover letter stating a request for RN2 ‘New Residential – Priority 2’ on these lands.



Zoning Request:



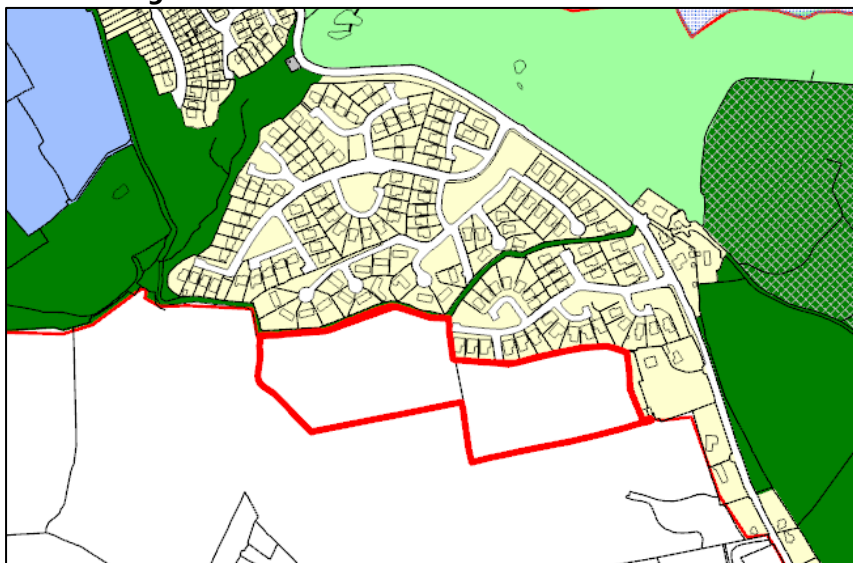
In support of this rezoning, the following grounds are put forward:

- The zoning of the land in previous plans, including residential and later Strategic Land Bank.
- The site is clearly an infill site and is surrounded by zoned land, taking a zoning designation away is unjustified.
- The land is located with the town boundary as defined by the CSO, and is within walking distance to the town centre.
- The land is fully serviced, with an existing foul drainage connection, served by an existing water tank, public footpath connection.
- The development of the land would constitute sequential development and provide approximately 120 units at 30 units per hectare.

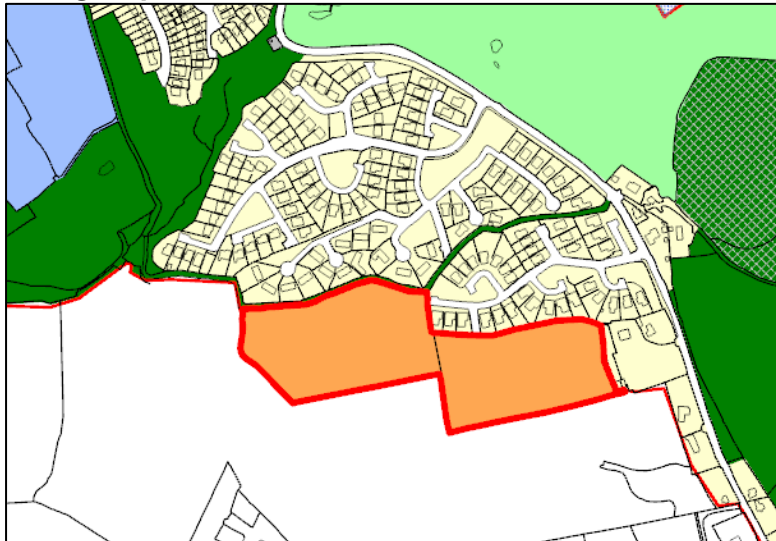
155 [Ronan O’Caoimh](#)
[Ref 220916](#)

It is requested that lands of c. 6.2ha at Dunbur Lower, outside the settlement boundary and with no specific land use zoning, be zoned for residential development, with the cover letter stating a request for RN2 ‘New Residential – Priority 2’ on these lands.

Draft Zoning:



Zoning Request:



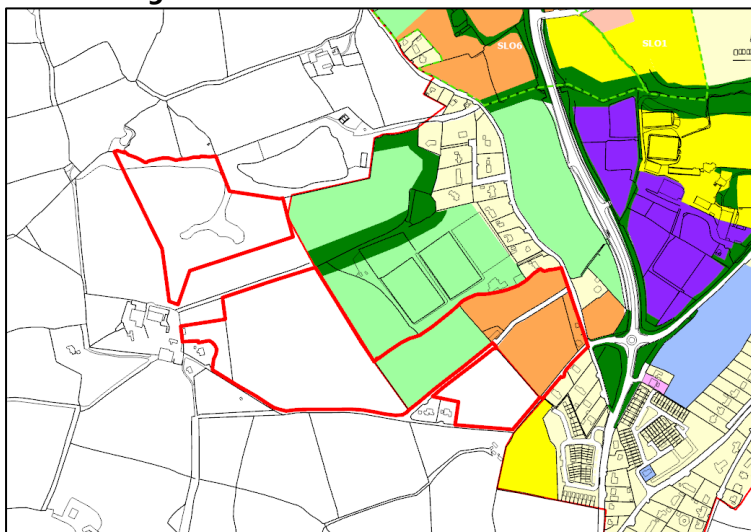
In support of this rezoning, the following grounds are put forward:

- The zoning of the land in previous plans, including residential and later Strategic Land Bank.
- The land is bounded by existing residential development to the north and east, adjacent to taken in charge and fully serviced developments.
- The land is located with the town boundary as defined by the CSO, within walking distance (1.5km) to the centre of the town which will promote compact growth.
- Connection to existing foul sewers and mains water connection at the adjoining Seacliff residential development is feasible, as is footpath and road access.
- The development of the land would constitute sequential development and provide approximately 200 units at 30 units per hectare.

156 [Ronan O’Caoimh](#)
[Ref 221123](#)

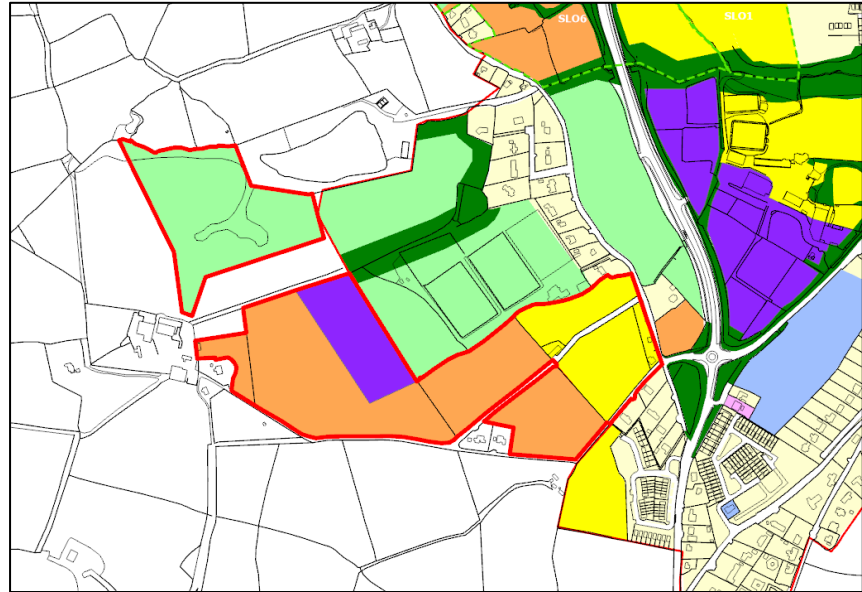
It is requested that c. 3.5ha of lands at Ashtown Lane, Ashtown/Hawkstown Lower, zoned RN2 ‘New Residential – Priority 2’, be zoned RN1 ‘New Residential Priority 1’ and c. 5.6ha additional lands be zoned for RN, E and AOS.

Draft Zoning:



Zoning Request:

[The phasing of additional residential lands was not raised and are shown below as RN2 'New Residential – Priority 2'.]



In support of this rezoning, the following grounds are put forward:

- The land is located within the LAP boundary, close to the centre of Wicklow Town and the relief road (Hawkstown Road), within walking distance (1km) of the town and will promote compact growth.
- The land is fully serviced with a foul waste connection, and the lower levels of the lands are served with a mains water connection, as confirmed by Irish Water pre-connection application. The landholder would be happy to build a water storage tank and associated infrastructure at his cost. The land is served by an existing surface water outfall in the form of a stream at the north-east corner of the land. A footpath terminates at the southeast corner of the lands, with the land fronting onto Ashtown Lane.
- A new planning application for residential development has been submitted on the lands (Reg. Ref. 24/60688).
- The development of the land would constitute sequential development and should be considered an infill site. The local authority has developed land for social housing to the south at Ashtown Lane. Development will provide approximately 100 units at 30 units per hectare.

It is requested that

- lands of c. 5.6ha at Ashtown/Hawkestown, outside the settlement boundary and without a specific land use zoning, be zoned AOS 'Active Open Space'.
- lands of c. 2.3ha at Ashtown/Hawkestown, outside the settlement boundary and without a specific land use zoning, be zoned for Commercial Light Industrial Use.
- that lands of c. 7.9ha at Ashtown/Hawkestown, outside the settlement boundary and without a specific land use zoning, be zoned for Residential Use.
- lands of c. 2.4ha at Ashtown/Hawkestown, zoned AOS 'Active Open Space', be zoned for Residential Use.
-

In support of this rezoning, the following grounds are put forward:

	<ul style="list-style-type: none"> ▪ The purpose of the Strategic Land Bank was to retain the land within the development boundary of the settlement for future strategic development. It would be appropriate now to consider this land for inclusion with a land use zoning other than SLB. ▪ The land should be considered for a mixture of uses to promote sustainable development and reduce vehicular journeys. Residential and commercial light industrial uses provide employment that is accessible by bicycle/walking, in line with the Draft Guidelines for Planning Authorities on Sustainable and Compact Settlements. ▪ The area is already well served with community and active open space uses and this could be expanded upon in the new plan.
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Chief Executive Response

While the sites put forward in these submissions have their own locational and physical characteristics, they have a number of commonalities and hence it is possible to respond to all three together. All of the sites are considered peripheral to the town / village centre and were previously zoned 'SLB – Strategic Land Bank'. Other than the site detailed in the first submission described above (Greenhills Road), the remaining sites are currently located outside of the CSO 'built up area' boundary.

During the preparation of the 2013 Plan, compliance with the Regional Plan, the County Development Plan and subsequently a Ministerial Direction, necessitated the SLB designation of some previously zoned lands, including the lands that are subject of these submissions. As part of the preparation of this new plan, more than 10 years later, a similar review was required to be undertaken, in order to ensure that any new draft plan prepared is similarly consistent with all higher order strategies and plans. The residential zoning provisions of the draft plan in particular have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In particular, the key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form and pattern of development in Wicklow Town and Rathnew Village was carefully analysed as part of the plan crafting process, as detailed in the draft plan and associated appendices. This analysis determined the need to capitalise on the potential of the town and villages centres, on regeneration areas such as Wicklow waterfront, and on infill opportunities with the existing built footprint of the settlements, with a small number of edge of centre, serviced, greenfield lands being identified for new residential development.

In these regards, the request for the zoning of additional land for residential use, and the alteration of the phasing of residential land from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1', as detailed in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

Therefore, the CE does not recommend the zoning of these lands for residential development or amendment of RN2 to RN1.

With respect to the AOS zoning request for the Ashtown area, while an additional area of AOS would be welcome, it is taken that this suggestion are part of the overall proposal for this area and is not 'stand alone';

therefore this request is also not support. The suggested 'E Employment' zone is not supported given its haphazard and peripheral location.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.10.2 Specific Local Objectives (SLO)

SLO 2 Tinakilly / Newrath

No.	Name	Issue raised
20	Darren Fitzgerald Ref 095418	Protect Fairy Tree and lands around Tinakilly for Biodiversity.
24	Henry & Aoife Clarke Seamus & Evelyn Ryan David & Caroline O Neill. Ref 185913	<ul style="list-style-type: none"> ▪ Access to Rathnew Village centre will be difficult. People unlikely to walk like they do now due to increased traffic volumes in village centre. ▪ The R750 through the village centre will become a rat run for people to avoid traffic congestion along the so-called RIRR. This is highly likely to incentivise people to speed through the village centre to avoid traffic jams. ▪ Protect right of way along Tinakilly Avenue. This right of way is fundamental to our daily access. Full and uninterrupted rights of access to our homes must be considered a red line issue by Wicklow County Council before the implementation of any new LAP. Any interruption or attempted alteration of this right of way will be cause for legal action. ▪ The top section of Tinakilly Avenue is considered “overflow carparking” by Wicklow County Council. It is irresponsible and dangerous to try use it as access for pedestrians and cyclists as indicated in SL02 (LAP SL02 concept plan) to and from any proposed future housing development. Tinakilly Avenue is used as an access for residents, businesses, and local farmers. It is also a popular walking route for the communities of Rathnew and Wicklow Town. ▪ It is commendable that the fairy tree is proposed to be protected. Would like a TPO on this tree in its original location. ▪ Requested that the trees along Tinakilly Avenue should be considered for TPO's. Submitted that these trees should be protected through tree preservation orders due to their age and ecological importance.
25	Thomas O Sullivan Ref 162950	Heritage trees going to be eliminated at Tinakilly and Halpin's Avenue if they build the road.
46	Susan Gavin Ref 170719	Protect the trees along Tinakilly Avenue.
48	Eileen Howell	<ul style="list-style-type: none"> ▪ Use of Tinakilly Avenue by pedestrians/cyclist -public liability issue. ▪ Removal of vehicular access for those living on Tinakilly Lane. ▪ RIRR will destroy the Avenue. ▪ Trees lining Tinakilly Avenue are 100s of years old and deserve to be maintained and preserved.
81	Bill Clare Ref 191200	Tinakilly is being destroyed and is probably the last place people from the community have to enjoy nature and all it has to offer, there is plenty of places to build houses that are needed but we need to leave our beauty spots and wildlife alone.
83	Mia Merrigan Ref 202755	<ul style="list-style-type: none"> ▪ Specify type of residential build in Rathnew/Tinakilly Area. Removal of apartments with car parking and little or no green areas being replaced by residential houses with gardens would reduce run off and contribution to the flooding risks. ▪ ABP state that Rathnew is overzoned for housing. ▪ Plan to run a road through this avenue goes against the natural environment access, biodiversity and keeping/protecting amenities for public utility, tourism, educational/community, recreational use which Tinakilly Avenue and Broadlough lake provides for the community. ▪ It is proposed to destroy an historic tree line avenue.
87	Claire	Destruction of Tinakilly Avenue and green areas around Rathnew. Tinakilly Avenue –

	McGettigan Ref 203844	destroyed.
89	Sinéad Ryan Ref 211109	<ul style="list-style-type: none"> ▪ Long-term residents of Tinakilly Avenue have an established legal right of way along the entire avenue, extending up to Rathnew Cemetery. This right of way is not merely a convenience; it is a fundamental necessity that must always remain fully protected and uninterrupted. ▪ It is imperative that the council recognises this as a red-line issue and respects the legacy and future of Tinakilly Avenue and its residents. ▪ Positive that the Fairy Tree is to be protected.
100	Lisa Mc Gettigan Ref 234627	Why are we constructing a main road through the picturesque Tinakilly Avenue, a beloved spot for both local and distant residents for generations?
160	Mark Mcgettigan Ref 223707	The new proposed road through Tinakilly will destroy one of our last green /nature areas, it is unnecessary as alternative routes for relief of traffic from Wicklow town are available-i.e. Rocky road route to motorway and or upgrade to Marlton road to beehive connection.
162	Albert Morley Ref 224844	Thank you for sparing the Fairy Tree and recognising its cultural significance to the area. It thankfully remains as a reminder to our ancient tradition of storytelling. Can the plan be amended to included provisions to protect more mature trees on zoned lands.
165	Clare McEvoy Ref 234603	Too much additional land zoned as residential (RN1) - in particular the SLO2 area at Tinakilly. This land is dependent on the Inner Relief Road for access - this road will damage the natural character of Tinakilly Avenue and the mature trees.

Chief Executive Response

Submissions which raised issues with specific reference to flooding in the Rathnew and Tinakilly Area, including the SLO2 area have been addressed under Section 6 of this report, Strategic Flood Risk Assessment.

Issues which generally refer to the level of residential development in the settlement of Rathnew –Wicklow and the Tinakilly area in general are addressed under Chapter 3 Residential Development and Section 4.3.10.2 Specific Local Objectives (SLO) SLO 2 Tinakilly / Newrath of this report.

Issues raised with regard the need for the Rathnew Inner Relief Road (RIRR) and its route are addressed under Chapter 9, Topic 2: Transportation, of this report.

Issues raised with regard to the impact of residential development on nature/wildlife and biodiversity are addressed under Chapter 3 Residential Development, Issue 2: Impact of Residential Zoning on nature/biodiversity of this report.

The following topics are addressed under this section:

Issue 1: Fairy Tree

SLO2 of the Draft LAP requires that the Fairy Tree is retained in its original location as part of the development of the RN1 lands.

Issue 2: Tinakilly Avenue - Access to the Avenue, Pedestrian Safety and the RIRR (Rathnew Inner Relief Road).

With regard to Tinakilly Avenue, the LAP does not seek to close access to Tinakilly Avenue to the public. The LAP seeks that once the RIRR is complete and operational, the entire length of the Avenue will be accessible to pedestrians and cyclists while vehicular access to Tinakilly Lane will be retained on the eastern section of the Avenue with the option of turning left or right onto the RIRR depending on where individuals are travelling to in their vehicle.

The LAP seeks that the entrance onto the R750 remains open for pedestrian and cycle access providing a convenient, safer and more direct connection for walkers and cyclist to the Village Centre from Tinakilly Lane, the existing and future residential development in this area and the existing glamping site at Tinakilly House.

It is noted that the junction on the R750 from Tinakilly Avenue is currently difficult to egress from for vehicles, especially if turning right towards Rathnew Village. The future arrangement along the Avenue coupled with the RIRR and other planned road interventions in the area, including the upgrade works to the Rocky Road, will reduce pressure on the roundabout in Rathnew Village Centre and remove this vehicular egress from Tinakilly Avenue onto the R750. It should be noted that one road intervention/improvement alone will not accommodate the volume of current and future traffic movements in the area and that the RIRR is part of a suite of road interventions required to accommodate future traffic movements along with improving and promoting walking and cycling routes.

With a reduction in through traffic in Rathnew Village and creating cycle and pedestrian links from existing and new residential development in the area, it is envisaged that the village centre will become a more pleasant environment for pedestrians, therefore increasing footfall in the village which would be beneficial to existing businesses and encourage the rejuvenation and regeneration of the village over time. The future regeneration of the Village is supported by specific objectives CPO 5.1 – CPO 5.24 under Chapter 5 Town and Village Centres - Placemaking and Regeneration of the 2022-2028 Wicklow County Development Plan.

A submission has indicated that the R750 through the village centre will become a rat run for people to avoid traffic congestion along the RIRR, thereby incentivising people to speed through the village centre to avoid traffic jams. In this regard motorists are obliged to observe the legal speed limit through the village and this is regulated by law enforcement.

With regard to concerns regarding the safety of the pedestrian/cycle route as indicated at the far eastern end of Tinakilly Avenue close to the hotel entrance from the lands to the north of the Avenue, this pedestrian access point is indicative. The detailed design of this access point regarding safety will be assessed as part of any future planning application. Its inclusion in the Draft LAP is to ensure a direct cycle/walking route to the hotel and across to the parkland currently under construction at Tinakilly Park providing a walking route not only for amenity purposes but also promoting soft modes of travel.

Concerns have been raised with regard to public liability and the use of the Avenue as pedestrian/cycle route. In this regard it is noted that length of Tinakilly Avenue is currently in use by pedestrians and cyclists as well as motorists. The issue of public liability is also outside the remit of an LAP which is a land use zoning plan.

Issue 3: Impact on the Tree line and Amenity of Tinakilly Avenue

With regard to the protection of the trees along Tinakilly Avenue and the protection of mature trees in general, the following Objectives are stated under Chapter 17, Natural Heritage & Biodiversity, of the County Development Plan 2022-2028. These objectives shall be considered in the assessment of any development on zoned and un-zoned lands in the County.

CPO 17.18 *To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of the long-term sustainability of a stable ecosystem amenity or the environment generally, as set out in Schedule 17.05 and Maps 17.05 and 17.05A - H of this plan”.*

CPO 17.19 *To consider the making of Tree Preservation Orders (TPOs) to protect trees and woodlands of high amenity value”.*

CPO 17.20 *Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged”.*

CPO 17.21 *To strongly discourage the felling of mature trees to facilitate development and encourage tree surgery rather than felling if such is essential to enable development to proceed. CPO 17.22 To require and ensure the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments”.*

CPO 17.23 *To require the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority)”.*

With regard to placing a TPO on the trees along Tinakilly Avenue, there is a separate procedure from the LAP for the protection of a tree / groups of trees via a Tree Preservation Order. Section 205 of the Planning and Development Act 2000 (as amended) sets out a process that must be followed before a tree / group of trees may be made subject to any such order, including public consultation and notification to owners, consideration of any submissions / objections and finally an adoption process by the members of the County Council. Any such process must be initially grounded on an assessment by a suitably qualified arborist. As Wicklow County Council does not have an arborist on staff it must therefore engage such expertise every few years when there are a number of trees / groups of trees needing assessment. Wicklow County Council does not currently have such an assessment scheduled. In this regard the draft LAP does not place a TPO on the individual Fairy Tree on the RN1 lands in SLO2 but the SLO does requires that the Fairy Tree is retained at its current location as part of the development of this residential zoned site.

The Avenue itself is zoned OS1 and no changes are envisaged along the length of most of the Avenue. The draft LAP also does not indicate that the tree line along Tinakilly Avenue is to be removed. The removal of vehicles from the western section of the Avenue will improve the safety and amenity of the avenue. It is noted that the surrounding fields are private property and were never publically accessible as amenity area for local people. In addition no changes are proposed to Tinakilly Lane and this route will still be available for walkers down to Broadlough.

With regard to the RIRR crossing and the trees along the Avenue, from a review of the tree survey submitted as part of PRR23/60219, a planning application which included the RIRR crossing and remaining northern section of this route, 4 no. trees were proposed to be removed from the Avenue to facilitate the RIRR crossing point comprising of 1 No. Category U tree, 2 no. Category C trees and 1 No. Category A tree. There were no proposals to remove other trees along the avenue as part of any this proposal. The removal of these 4 trees was considered reasonable to allow for the development of the RIRR.

Issue 4: Density/Unit Type

A submission has requested that no apartments or higher density development is specified on the lands in Tinakilly noting that the removal of apartments with car parking and little or no green area and their replacement by residential houses with gardens would reduce run off and contribution to the flooding risks.

In this regard zoned housing lands at Tinakilly, including the lands that are currently under construction, are not identified in any flood studies, either those of the Council or the OPW, the state agency responsible for flood identification and management, as being at risk of flooding, including in the longer term future scenarios developed by the OPW.

In terms of new development and the potential for increased run off to the Rathnew River, the Council is committed to implementing the objectives and standards of the County Development Plan in order to address and mitigate any potential impacts from new development.

With respect to the development format and the suggestion that a lower density type development would

mitigate potential risks, in accordance with national and county policy, land that is suitable for residential development should aim for the highest density feasible given settlement designation in the County hierarchy, the site location, services available and characteristics of the area. In this regard, a medium density development is suitable and optimal for the Tinakilly, lands, which incorporates a range of house types and sizes, including duplexes and apartments. However it should be noted that these 'higher' density formats are only a small element of the overall development permitted to date and the emerging plans for the future sections.

It is further noted that with regard to individual dwellings with back gardens, home owners may choose to pave/hard landscape large sections of these private gardens which results in a reduction in the ability for sites to absorb rainfall and reduce run off while the communal open spaces associated with apartment development are more easy to regulate in terms of the level and type of hard and soft landscaping proposed and the ability of these open space areas to absorb rainfall and reduce/control runoff.

Issue 5: Childcare to support development at Tinakilly

As part of the development of the RN1 lands in SLO2, the Draft LAP requires that the development of these lands includes the provision of a childcare facility at an appropriate location on the RN1 zoned lands in line with the relevant Guidelines for Planning Authorities.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

SLO3 Milltown North

No.	Name	Issues Raised
38	<p>Mary Byrne. Liz Byrne. Carmel Whelan Ref 131457</p>	<p>This submission relates to lands located on the R752 west of Rathnew village centre (these lands are zoned RN2 and OS in the draft plan as part of SLO3). In the current Local Area Plan, there is a requirement to facilitate a road through the submitters' lands, specifically policy RP7.</p> <p>Submitted that the wording under the current LAP with regard to the provision of this road was clear:</p> <ul style="list-style-type: none"> ▪ To 'facilitate' the development of a road; ▪ To 'facilitate access to new developments from the existing road network'; ▪ To 'prevent congestion at the Rathnew mini roundabout due to the development of employment zoned lands at Milltown/Charvey and achieve a good traffic circulation in the area. <p>The submitters had no objection facilitating such a road. However, in the new proposed draft Local Area Plan, this road objective for this same road has expanded in Specific Land Objective 3 (SLO3) to be in effect a new Regional Road, being required to be designed by people seeking planning permission on these lands, and no permission can be lodged until the road has been fully designed. The new Local Area Plan has thus made it a requirement to develop this land from 'facilitating' this road to making it a requirement to provide the road.</p> <p>In effect, the core reason for this road is to enable the current Regional Route, in fact the former National Route, to become a town centre area free of significant through traffic. This seems like an unreasonable burden to be based on employment zoned land, that is traditionally hard to get developed, and our site that can accommodate circa 60 houses. As the route will be 900m or so, this will cost circa 3.5 million, if it is to be developed as a regional route. It is not clear who is to design this road from Tighes Ave to the R752.</p> <p>It is submitted that there is actually no need to have this entire road designed before development of the submitter's site. . The first 100m of the land cannot be developed for housing given the set back from the M11 boundary required by the County Development Plan. There is thus a surplus of land in which to get a road line designed, and thus allowing the site to proceed would not prejudice or inhibit the design of this route.</p> <p>The following amendment is requested to the text in SLO3</p> <ul style="list-style-type: none"> ▪ A new link road is to be provided to connect Tighe's Avenue to the R752 <i>to be developed in phases along with the development of the zoned lands it passed through.</i> ▪ No development may occur in this area until an overall design has been determined for the road network in the area, including but not limited to <ol style="list-style-type: none"> a) <i>the final northern section of the RIRR connecting same to the R772 and a route from the R772 to the R752 ,unless it can be demonstrated in an application that sufficient land will be left undeveloped to enable a satisfactory route to be designed.</i>

102

[Margaret Geary,](#)
[Roisin Snell, Olive](#)
[Stafford](#)

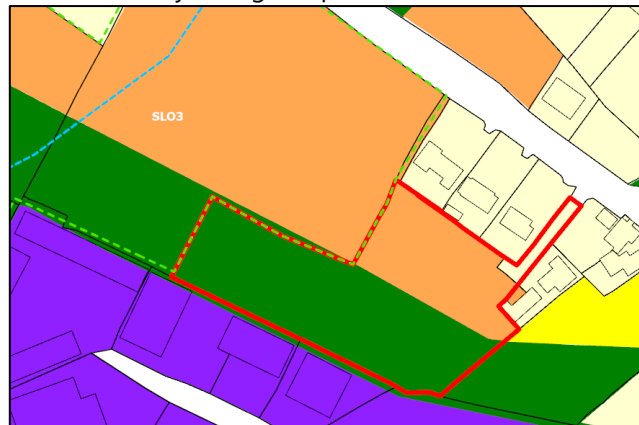
It is requested that lands of c. 0.8ha zoned for RN2 and OS1 are taken outside of the boundary of SLO 3. In support of this SLO boundary change, the following grounds are put forward:

- It is wished to build on this land in the immediate future, SLO3 would be prohibitive to this, specifically: *"No development may occur in this area until and overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting the same to the R772 and (b) a route from the R772 to the R752"*.
- The exclusion of the land is straightforward and will not impact any other plots or landowners.
- Exclusion of the lands would be immaterial to the aims and objectives of SLO3 due to the moderate size of the lands.
- Plans for neighbouring lands are unsure so the subject lands should be considered on a stand-alone basis.

Draft SLO3 boundary:



SLO3 boundary change request:



Chief Executive Response

Submission 38

The Local Authority is committed to addressing local transportation issues and a key element of its strategy is to address the congestion between Wicklow Town and Rathnew, and onwards between Rathnew and Junction 16, via a suite of interventions including (but not limited to) the development of a new link road between Tighe's Avenue and the R752 for Glenealy – Rathdrum bound traffic.

Following the adoption of this LAP, the Local Authority is committing to preparing a Local Transport Plan, which will further detail an overall strategy and programme for addressing any existing transportation issues and supporting further development with appropriate infrastructure. This LPT will provide for a programme for

the finalisation of the optimal route and design for this new route, as well as a delivery and funding programme. This will address any phasing programme required, and therefore it is considered it would be premature at this time to make the change to the draft LAP is suggested.

Submission 102

While the removal of these lands from SLO3 would not undermine the objectives for SLO3, it is unclear how these lands could be access other than via other lands in the SLO3 block. The entry way shown in the submission is only 6m wide and would therefore no be adequate for a 2-way road (wide enough for refuse / emergency vehicles) and footpaths. However, this would be a design matter for any future applicant for permission to address and is not a reason to not accept to this request.

Chief Executive’s Recommendation

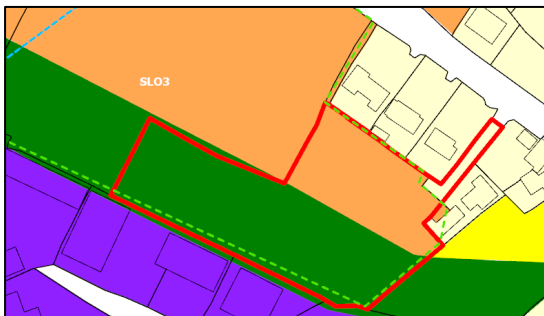
Amend SLO3 map and text as follows:

This SLO is located in the townlands of Milltown North and Ballybeg. The SLO comprises Employment (E), New Residential (RN – Priority 2) and Natural Areas (OS2) zonings. Any development proposal shall comply with the County Development Plan, this Local Area Plan and the following:

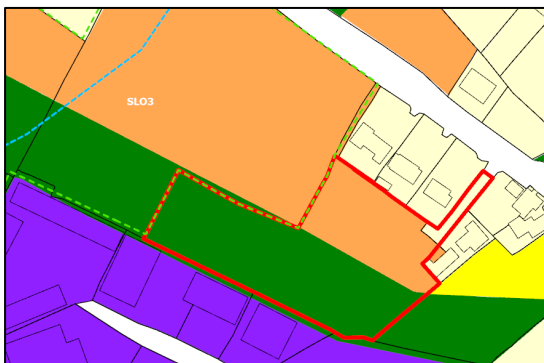
- *A new link road is to be provided that connects Tighe’s Avenue to the R752, to be developed in accordance with the delivery programme set out in the future Wicklow Town – Rathnew Local Transport Plan;*
- *No development may occur in this area until an overall final design has been determined for the road network in the area, including but not limited to (a) the final northern section of the RIRR connecting same to the R772 and (b) a route from the R772 to the R752*
- *Any development on these lands shall take into account the N11 set back distances as specified for different development types in the County Development Plan.*

Amend SLO3 zoning map as follows:

Change from:



Change to: (remove the area in red from SLO3 area)



SLO 4 Bollarney North

No.	Name	Issue raised
41	Amy McNabb Ref 52435	Request removal of RN2 zoning from this site for residential amenity and biodiversity reasons.
49	Rosaleen and Martin McNabb Ref 210520	Opposed to SLO4 on biodiversity grounds, in particular birds and small animals. Suggest area be preserved as a public park or sports facility as not enough green infrastructure to cope with the level of residential development proposed.
51	Stephen Reynolds Ref 081816	Strongly opposes the RN(2) New Residential - Priority 2 rezoning area in SLO4 on residential amenity grounds, traffic and environmental grounds.
90	Louiaw McNabb Ref 202834	SLO4 – objects to new RN2 zoning.
99	Stan Breathnach Ref 000330	Suggest SLO4 be zoned for parkland and allow it to become the gateway to the Greystones to Wicklow Greenway.
109	Melissa McNabb Ref 093952	Objects to new RN2 zoning. SLO4 should be reconsidered for sports activities.
119	Kyran and Maeve O'Grady Ref 131316	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife.
127	Garrett Kennedy Ref 150541	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats directive
129	G Kennedy Ref 152438	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife. Compliance with Habitats Directive.
134	Lyndsay Martin Ref 161122	Suggests de-zoning of lands next to Broadlough SAC for housing. Concerns regarding the impact this zoning will have on the SAC/SPA. Impact on biodiversity and wildlife.

Chief Executive Response

Changes to Zoning

The following submissions which seek zoning changes to individual land parcels in SLO4 are addressed under Chapter 11, Section 4.3.10.1 of this report - submission No.'s 10, 14, 52, 69, 78, 86 and 91.

Submissions which raised concerns with regard to flooding on lands within or close to SLO4 are addressed under Section 6 Strategic Flood Risk Assessment of this report.

With regard to the proposed RN2 zoning in SLO4 and their impact on biodiversity and in particular their impact on The Murrough Wetlands SAC and The Murrough SPA please refer to Section 5 Strategic Environmental Assessment and Appropriate Assessment of this report. It is noted that based on Section 5 of this report it is recommended that the following text be included in the objectives listed for the development of SLO4:

"All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects.

In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans."

Traffic

With regard to the impact the RN2 zoning would have on local traffic in the Knockrobin area it is noted that these lands are proposed to have vehicular access onto the Port Access Road which was design to carry of the level of traffic generated by the previous and currently proposed land use zonings along it (the lands are currently zoned for Employment use).

In this regard it is noted that draft LAP seeks to reduce the level of land zoned for development in this area by increasing the green buffer along the southern side of The Murrough by zoning more lands for OS1 and OS2. The draft LAP also seeks to rezone lands previously indicated for employment use to residential use. It is noted that employment uses and residential uses are the biggest trip generating land uses and that on balance the Port Access Road has capacity to deal with trips generated by the level of residential zoned lands proposed. In addition, this site will be located directly across from the new active travel overbridge (over the railway line) which will make this site within a 5 minute walk of Wicklow Train Station and a 10-15 minute walk of Wicklow Main Street, encouraging future residents to walk or utilise public transport making this a more suitable location for residential development.

Residential Amenity

In terms of the impact the proposed RN2 zoning would have on existing residential properties in the area, the potential impact of any proposed development on the privacy and amenity, including impact on sunlight/daylight levels, would be assessed as part of any planning application submitted on these lands in accordance with the relevant objectives as outlined in the 2022-2028 Wicklow County Development Plan but in particular the following which relate specifically to the protection of the residential amenity of existing residential areas:

***CPO 6.3** New housing development shall enhance and improve the residential amenity of any location, shall provide for the highest possible standard of living of occupants and in particular, shall not reduce to an unacceptable degree the level of amenity enjoyed by existing residents in the area.*

***CPO 6.26** While the zoning objectives indicate the different uses permitted in principle in each zone it is important to avoid abrupt transitions in scale and use at the boundary of adjoining land use zones. In these areas it is necessary to avoid developments that would be detrimental to amenity. In zones abutting residential areas, particular attention will be paid to the use, scale, density and appearance of development proposals and to landscaping and screening proposals in order to protect the amenities of residential properties.*

Sports Facilities SLO4

With regard to the provision of sports facilities on these lands, please refer to Chapter 7 Community Development, Section 4.3.6.2. There would be concerns with regard to the provision of floodlighting to facilitate sports facilities at this location and the impact such lighting and noise from potential matches would have the birds in The Murrough SPA.

Chief Executive's Recommendation

Add the following objective to SLO4 Bollarney North

All proposed projects within zoning area SLO4 – Bollarney North shall: have full regard to the Habitats Directive (with particular regard for the Murrough SPA and the Murrough Wetlands SAC), including being subject to AA that identifies and addresses any likely significant effects.

In doing so, proposed projects and associated AAs in this area shall, as relevant: be informed by appropriately targeted ecological surveys of the Qualifying Interests of the SAC and SPA; and give due consideration to any requirement for project level mitigation, including additional visitor management plans.

SLO 6 Ballynerrin

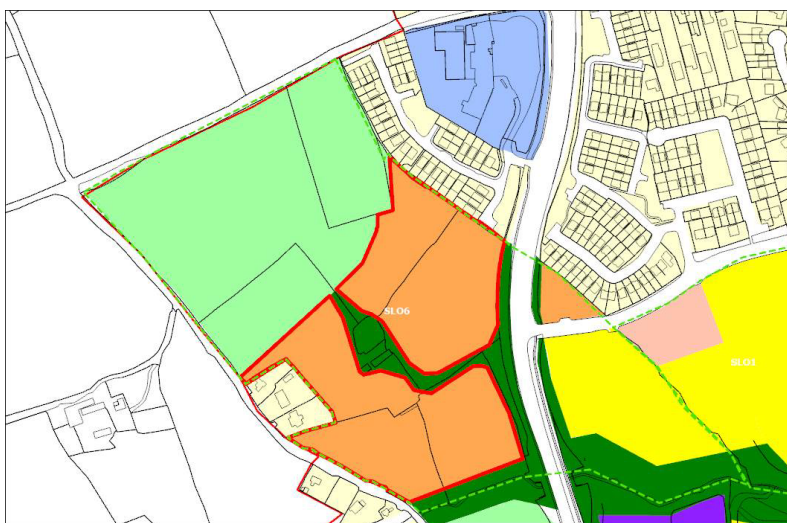
No.	Name	Issues Raised
30	Stephanie Gavin Ref 110933	<ul style="list-style-type: none"> ▪ Lands around Wicklow Educate Together National School zoned for sports and for Priority 2 housing. Priority 2 housing should also change to sport and community too. ▪ Current provision of AOS insufficient. ▪ No playground facility or sports facility for teenagers serving residential development along the Hawkstown Road side of the town.
32	Shane Cowell Ref 120640	Land along Hawkstown Road should be used for sports and recreation use. Lack of facilities on this side of the tow
31	Andrew Sullivan Ref 115529	Submission 31, 33, 34, 35 and 39 are similar in wording and have been grouped together. These submissions request the following: <ul style="list-style-type: none"> ▪ Change the residential zoning at SLO6 to AOS. ▪ This will compensate for the 37 acres in Tinakilly that were never developed. ▪ Allow for a large sports facility for multiple sporting facilities. ▪ It would have a number of access points and with the development of the Rocky Road out to the N11, it means teams traveling to Wicklow for matches would not have to travel through the town.
33	Orla Malone Ref 122859	
35	Deirdre Malone Ref 123205	
39	Catherine Ryan Ref 134204	
36	Caoimh Bruton Ref 124533	Suggests residential zoning at SLO6 be changed to AOS to allow for much needed proper sporting facilities - basketball courts, running tracks, Astro pitches etc
42	Siobhan Connery Ref 155959	<ul style="list-style-type: none"> ▪ Residential zoning at SLO6 should be changed to AOS. ▪ This will compensate for the 37 acres in Tinakilly that were never developed. ▪ Allow for a large sports facility with the potential for a 2km running track for local athletics club Inbhear Dee who currently train on a dark wet football pitch and in car parks. ▪ This site would have a number of access points and with the development of the Rocky Road out to the N11; it means teams traveling to Wicklow for matches would not have to travel through the town.
44	Fiona Fitzsimons Ref 164436	<ul style="list-style-type: none"> ▪ Residential zoning at SLO6 should be changed to AOS. ▪ This will compensate for the 37 acres in Tinakilly that were never developed ▪ Would provide facilities for a number of local sports clubs. These include Inbhear Dee athletics club, Wicklow basketball, Rathnew Boxing, Wicklow rowing club, Wicklow dolphins amongst others. In the last area plan submitted, not one single area identified for AOS was developed and this space identified would be perfect solution to meet the future needs of clubs. ▪ This area has a number of access points in situ and further development of Rocky Road out to the main artery of the N11, would reduce traffic flow through our already congested town for travelling visitors/opponents.
56	Lynda Bremner Ref 111936	<ul style="list-style-type: none"> ▪ Residential zoning at SLO6 should be changed to AOS to allow a greater integrated piece of land be dedicated solely for the sports and recreational needs of this growing community. ▪ Over the past number of years, with growing numbers of residents, the existing clubs have become oversubscribed and severely lacking safe space and access to even basic amenities.
64	Wicklow Squash Club Ref 122833	<ul style="list-style-type: none"> ▪ Objective: To establish Wicklow Squash Club; A squash facility with 3 indoor courts, and shared locker rooms, showers, and communal area with other clubs e.g. local boxing club, athletics club and basketball club for example.

		<ul style="list-style-type: none"> Requested that SLO6, the area zoned residential between the Rocky road and Hawkstown road be changed to AOS. Would in some way compensate for the 37 acres in Tinakilly that were never developed as AOS. This would also have huge potential to develop multiple sporting facilities for our future generations. SLO6 would have a number of access points and with the development of the Rocky Road to the N11, giving the possibility of teenagers / children to walk from local schools while also allowing traveling teams to Wicklow for matches have easy access.
103	Louise Ruttledge Ref 065711	Change the RN2 zoning in SLO6 to AOS. There are too many houses and not enough sports resources for growing population
116	Noreen O'Reilly Ref 111620	<ul style="list-style-type: none"> Lack of suitable sports facilities athletics Tinakilly, which was a designated active leisure area is now history as with no parking and no lighting, it is unsuitable. SLO6 - Residential zoning at SLO6 change to AOS to provide for sporting needs of all sporting communities. This site is the final opportunity for a greenspace, in the town, to be developed to meet the growing needs for a sport facility in Wicklow
121	Anja Karamalis Ref 142758	<ul style="list-style-type: none"> Amend the local area plan to include sports pitches, playgrounds etc on the north side of the Hawkstown road between the Rocky Road and the roundabout to Marlton area. The area needs to be developed as a sports & recreation area, not housing. The whole area between Marlton Road and Hawkstown road has housing and housing is still being built without a single playground, adequate green area or sports facility.
122	Colm Ó Broin Ref 142644	Submissions 122 and 123 are similar in wording and have been grouped together. These submissions request the following:
123	The Meadows Estate Residents Association Ref 143928	<ul style="list-style-type: none"> Land to the north side of the Hawkstown Road between the Rocky Road and the Marlton Road should be zoned for amenity and development as a sports and recreation area. This type of facility is sorely needed in this part of Wicklow Town, there are a large and growing number of families in the area but no sports pitches (including 5 a Side pitches) or playground. Making this change will have health (including mental health) benefits.
124	Epi Karamalis Ref 144557	<ul style="list-style-type: none"> The land on the north side of the Hawkstown Road between the Rocky Road and the Marlton Road should be zoned for amenity and development as a sports and recreation area. This type of facility is sorely needed in this part of Wicklow Town, there are a large and growing number of families in the area but no sports pitches (including 5 a Side pitches) or playground.
137	Anne Dowling Ref 155101	<ul style="list-style-type: none"> Requested that the land zoned for amenity and development as a sports and recreation area on the Northside of the Hawkstown Road. Not enough sports or play facilities on this side of the town. Need to keep this whole area for the running track and extra pitches (including astro) which are badly needed.
138	Caroline Cullen Ref 163112	<ul style="list-style-type: none"> Request to have sports pitches, playgrounds etc built on the north side of the Hawkstown road between the Rocky Road and the roundabout. The whole area should be developed as a sports & recreation area and not housing. Would be great as we don't have anything like that in this part of the town.
150	Helen Fitzsimons Ref 200032	<ul style="list-style-type: none"> Leave entire field above Hawkstown Road for amenity and consider allotments. Back gardens in new build estates are small and often overshadowed, and

		<p>the soil left by builders is often down to boulder clay with poor drainage. Landlords are often very reluctant to allow a tenant to grow fruit trees or plant vegetables and prefer to pave the back garden, and apartments obviously have nothing.</p> <ul style="list-style-type: none"> ▪ A lot of benefits from allotments including physical and mental health benefits and community building.
151	Aoife Kirwan Ref 211650	The land between Rocky Road and the roundabout at the top of Marlton Road should be used for sports facilities. We have no local playground or play areas for kids. Need more green spaces and parks. Too much housing.
161	Wicklow Basketball Club Ref 225317	<ul style="list-style-type: none"> ▪ In the past 30 years there hasn't been sufficient allocation of sports and recreation resources to accompany the growing population of the Wicklow/Rathnew area. ▪ SLO6 - Having reviewed the Land Use Zoning Map it seems clear that the Hawkstown Road & Rocky Road sites should become a Sports Hub. It doesn't make sense to insert a residential development between the two. ▪ By combining these three sites into one, you are essentially future proofing the needs of generations to come. This combined site can then be developed over a period, as and when funding becomes available. As the local clubs will be the end users, collaboration with them is essential in how this site will be developed to ensure that we get it right.
164	Leonie Quinn Ref 231637	<ul style="list-style-type: none"> ▪ Need recreational space at the south west end of Wicklow. ▪ Marlton area full of housing estates but there are no real green spaces, walks, playgrounds. ▪ The area south of Educate Together primary school on the west side of the Hawkstown road would be an ideal area to develop sports facilities and a playground for all the young children in the area in particular. ▪ Also as a member of a group trying to set up a volleyball club, it would be great to have a communal space that could facilitate that. There are no halls for rent in Wicklow town big and especially tall enough to allow many indoor sports.

Chief Executive Response

The submissions listed above are seeking to change in the RN2 zoning to the western side of Hawkstown Road in SLO6 to AOS. The map below shows the current proposed zoning on the SLO6 lands with circa 5.5ha zoned AOS as indicated in light green with the remainder of SLO6 zoned RN1 (Yellow), RN2 (Orange) and OS2 (Dark Green).



The following map shows the rezoning request with the RN2 zoning to the west of the Hawkstown Road changed to AOS.



The Social Infrastructure Audit appendix of the LAP includes an audit of sports and recreation future land use needs within the settlement. The draft LAP has zoned the required amount of land for Active Open Space (AOS) and Community (CE), which allows for sports facilities to be developed, for the future needs of the population of the settlement and its catchment.

In this regard in accordance with WCC's Active Open Space Policy, active open space shall be provided at a rate of 2.4ha per 1,000 population divided into:

- 1.6ha outdoor play space (pitches, courts, sports grounds)
- 0.6ha casual play spaces (parks)
- 0.2ha equipped play space (playgrounds and MUGAs)

Based on the above rates and considering the 2031 population target of 19,400 persons for Wicklow Town - Rathnew, the following areas of active open space are required at a minimum:

46.4ha overall needed for the plan area comprising of:

- 31ha outdoor play space
- 11.6ha casual play spaces
- 3.8ha equipped play space

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 projected 2031 population of the settlement and catchment is c.27,900 persons.** The following areas of active open space are therefore required at a minimum:

66.8ha overall needed for the plan area and catchment area comprising of:

- 44.6ha outdoor play space
- 16.7ha casual play spaces
- 5.5ha equipped play space

It was also identified through the pre-draft plan public consultation that there are additional / specific needs as follows:

- Athletics club grounds / running track
- Sports and community centre
- Indoor amenity facilities
- Indoor sports facilities
- Walking and cycling trails

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 settlement **excluding** Wicklow Golf Club.

Therefore at a minimum there is a **need to zone a total of c.66.8ha** of active open space in the settlement to cater for the settlement and its catchment during the lifetime of the next LAP. The Draft LAP therefore proposes to zone an additional 30.6ha of AOS in addition to the existing c. 45.7ha of AOS in the settlement **giving a total of 76.3ha zoned AOS in the settlement.** This is **9.5ha above the minimum requirement.**

With regard to the location of AOS 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. In this regard, new undeveloped AOS lands are proposed at the following locations:

Zoned Undeveloped Land		
Location	Zoning	Area (ha)
Hawkstown Road	Active Open Space	4.7
Rocky Road	Active Open Space	5.6
Brides Head	Active Open Space	4
Ashtown Lane	Active Open Space	7
Tinakilly	Active Open Space	2.45
Ballynabarney	Active Open Space	3.7
Bollarney	Open Space	3
Total new open space lands		30.6 hectares

The table above includes the 5.6ha of AOS zoned along Rocky Road in addition to a further 4.7ha along the Hawkstown Road circa 200m to the south of the AOS lands at Rocky Road. With respect to these adjacent lands, WCC has developed draft Sports & Recreation plan for the Hawkstown Road site and it is intended this will be developed as a multisport facility ideally including an indoor facility.

SLO6 includes a proposal to create a green cycle/pedestrian link through the proposed RN2 zoning connecting the proposed AOS between Rocky Road and Hawkstown Road. This green link follows a mature hedgerow and tree line which is to be retained as part of any future residential development on this site. The route will also benefit from passive surveillance from the residential development on either side. The proposal to retain this mature tree line and hedgerow may have hampered the development of sports facilities on this particular site and it is considered that this site is more suitable to future residential development noting it is also serviced and accessible and located close to schools and future AOS. There are also some existing residential dwellings located along Ashtown Lane immediately to the west of this RN2 site.

In addition, as identified by the Social Infrastructure Audit referred to above, there isn't a need for additional AOS lands to be zoned in this particular area above what is proposed in the draft Local Area Plan.

There are also concerns that if sports facilities were to be clustered together on one single large site on the

scale requested, this would lead to traffic issues in the immediate locality, especially on match/event days. It would also result in such facilities not falling within a reasonable walking/cycling distance of the majority of residents in Rathnew and Wicklow Town. However, it is considered that the clustering similar type sports together, for example racket sports or field sport, could work well.

With regard to the development of AOS, it should be noted that the purchase of lands and provision / development of sports facilities by the Local Authority is outside the remit of the LAP, however in 2025, as part of the National Sports Policy, Wicklow County Council will be developing a **Local Sports Plan** for the County, which will identify infrastructure needs as well as a project delivery programme for new facilities. All of the submissions made with respect to sports infrastructure to this LAP will be considered in the preparation of the Local Sports Plan.

With regard to the AOS in Tinakilly, 2.45ha zoned AOS under the current plan is permitted to be developed as a parkland with an area reserved/levelled for the possible future development of a playing pitch and associated car park when funding allows. The OS1 Open Space (c.6ha) on either side of the AOS in Tinakilly is permitted to be developed as parkland with walking routes, native woodland planting and wildflower planting linking back up to Tinakilly Avenue close to Tinakilly House. While this is not the amount of AOS envisaged under the 2013 LAP, the future development of this permitted public amenity is considered to be positive addition for both existing and future residents in this area.

With regard to the development of allotments the benefits of such a use in villages, towns and cities is acknowledged in particular with regard to mental health, general wellbeing and community building. It is considered that such a use would be more suited to Land Use Zoning OS1 rather than AOS. In this regard it is recommended that uses generally permitted on OS1 lands as outlined under Chapter 11, Section 11.1 of the Draft LAP be amended to include allotments.

Submissions which refer to the provision of playgrounds, open space, active open space and sports facilities in general are addressed under the Community and Development Section of this report.

Chief Executive's Recommendation

No change to zonings within SLO6.

Amend uses generally permitted on OS1 lands as outlined under Chapter 11, Section 11.1 of the Draft LAP be amended to include allotments as follows:

Uses appropriate for open space (OS1) zoned land are recreational uses such as formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas , ~~and~~ outdoor gyms **and allotments**.

SLO7 Rosanna Lower (RIRR) and SLO8 Rosanne Lower (School Site)

Issue 1: Tighe Avenue

No.	Name	Issue raised
48	Eileen Howell	The Concept Plan for SLO7 seems to show that Tighe Avenue will be closed off at the Maxol Petrol Station to create a 'T' Junction forcing traffic onto a portion of the proposed RIRR currently the R761(Newcastle Road) on which a further 100 houses are under construction. Ignoring current traffic volumes, if all of the housing zoned for is constructed this would mean almost a further 1000 cars on the road within a 1km radius of Rathnew village. Please acknowledge the rural aspect of this area.
Chief Executive's Response		
<p>Issue 1: Tighe Avenue</p> <p>Submission No. 141 refers specifically to a rezoning request and refers to SLO7 and SLO8. This submission is addressed under Chapter 11 Zoning and Land Use, Section 4.3.10.1 of this report, and therefore has not been included under this section.</p> <p>Submission No.48 refers to the Concept Plan for SLO7 and raises concerns that it is proposed to close off the access to Tighe Avenue from the R761 across from the Maxol Station and that cars will be forced onto a section of the RIRR, currently the R761 Newcastle Road.</p> <p>A concept plan has been prepared for each SLO to demonstrate how the future layout of the area may evolve however it should be noted that this is indicative only. The final layout and route of this section of the RIRR will be subject to detailed design at a later stage and will require planning permission.</p> <p>On foot of this submission, no amendments to the LAP are recommended.</p>		
Chief Executive's Recommendations		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.11 Appendix 2 Social Infrastructure Audit

4.3.11.1 Issue 1: Quantum of CE Zoned Lands

No.	Name	Summary of issues raised
142	The Delahunt Family Ref 133706	<p>We have reviewed the Social Infrastructure Audit (SIA) included with the Draft LAP and note the need for additional facilities based on the capacity of the existing primary and post primary schools in Wicklow-Rathnew.</p> <p>Submitted that the subject lands on the submitters land holding are unsuitable for the development of a school due to challenging topography and its proximity to existing schools. With three alternative sites already designated for school development that collectively address the projected shortfall in education capacity, the subject lands are unlikely to be necessary or practical for future school provision, Requested that the site is removed from page 49 of the draft LAP and from Table 2.10 of Appendix 2 of the draft LAP. It is also requested to rezone these lands to New Residential RN1.</p>
<p>Chief Executive Response</p>		
<p>Please note that submissions relating to the provision of schools, childcare/crèches, healthcare, Active Open Space/Sports Facilities and Playgrounds have been addressed under with Chapter 7 Community Development of this report.</p> <p>Please also refer to Chapter 11 Zoning and Land Use, Section 4.3.10.1 of this report for issues with regard to Land Use Zoning (Submission No. 142).</p> <p>With regard to the quantum of lands zoned Community and Education under the Draft LAP the Social Infrastructure Audit the following is noted:</p> <p>The draft LAP, in combination with the Social Infrastructure Audit appendix of the LAP has carried out a full audit of primary and secondary school capacity in the settlement of Wicklow-Rathnew. The Social Infrastructure Audit identified that there may be a need for additional primary and secondary school places in the settlement by 2031 to cope with the growth in demand within the settlement itself and the rural catchment it serves.</p> <p>The draft LAP has zoned the required amount of land for Community (CE), which allows for schools to be developed for the future needs of the population of the settlement and its catchment based on the findings of the accompanying Social Infrastructure Report.</p> <p>The LAP as a land use plan, can facilitate the provision of new schools through appropriate land use zoning however, it should be noted that the purchase of lands and provision / development of schools is outside the remit of the LAP and the Local Authority. The provision of primary and secondary school facilities in Ireland is determined on an area specific basis by the Department of Education (DoEd), having regard to available school capacity, demographic projections, an analysis of child benefit records, and local travel pattern modelling.</p> <p>The DoEd is monitoring the demand for and provision of schools in the LAP area on an ongoing basis and WCC will continue to consult and liaise with the DoEd in this regard.</p> <p>In accordance with objectives CPO 7.10, CPO 7.11 and CPO 7.12 of the County Development Plan, the Local Area Plan has zoned a number of sites within the plan area for 'Community and Education' that have the potential for the future provision of primary and post primary schools.</p> <p>The following undeveloped / brownfield lands have been zoned Community and Education (CE) for the potential development of new schools within the settlement in the future, and should be specifically reserved in the plan for school development only.</p>		

The following 3 sites have been selected following a detailed Transport Assessment and where it was clear that there was a gap in primary/secondary school provision within 15 minute walk of existing and proposed residential communities in these areas. From this assessment it is clear that there is a need for a primary school site to the north east of Rathnew village (Rosanna) and to the south west of Wicklow Town (Ballynerrin).

With regard to secondary schools it is clear that there is a need for a site in Rathnew, hence the lands at Ballybeg have been zoned for a secondary school site.

Zoned Undeveloped Land for a School		
Location	Zoning	Area (ha)
Marlton Road, Ballynerrin Lower	Community & Education	3.5
Ballybeg, Rathnew	Community & Education	5
Rosanna Lower	Community & Education	2

It is considered that these undeveloped/brownfield sites could be developed to provide for new schools in the area when the DoEd deem there is sufficient demand and funds available to facilitate the development of new schools in the area. The sites are located so that they are sufficiently distanced away from existing primary and secondary schools so that they will cater for the existing and future residential development within a 15 minute walk of the chosen site location.

In terms of primary and secondary school provision no amendments to the LAP are recommended.

With regard to other undeveloped sites zoned Community and Education including the site at Fernhill House which is the subject of this submission and measures c 1.7ha, the Social Infrastructure Report notes that *“there are further smaller undeveloped/brownfield CE zonings within the settlement that may be suitable but are considered less optimal but could also accommodate a new school site if needed”*.

These sites may also accommodate uses that are considered to be consistent with the zoning objective and description associated with this land use zoning. In the case of CE: Community and Education this land use has an objective *“to provide for civic, community and educational facilities”* and a description *“To facilitate the development of necessary community, health, religious, education, social and civic infrastructure”*.

In this regard the use of the site at Fernhill House is not limited to the provision of a primary or secondary school but may be use for the development of other uses considered to be consistent with the zoning objective and description as outlined above.

With regard to the request to change the land use zoning of this site from CE to RN1, the residential zoning provisions of the draft plan have been carefully calibrated to ensure compliance with the NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy.

Increasing the amount of lands zoned New Residential – Priority 1 (RN1) as detailed in this submission would exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

On foot of this submission, no amendments to the LAP are recommended.

Chief Executives Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.11.2 Issue 2: Provision of Community, Leisure and Entertainment Facilities

No.	Name	Issues raised
63	Luciana Queiroz Rufino Ref 114036	<ul style="list-style-type: none"> ▪ Build a sports centre and also build an art centre. There are so many good artists locally and it would be nice if they could expose their work in a specific place. ▪ Build a community centre where professionals could rent rooms to offer classes like yoga, pilates, dance class, for adults and kids. ▪ Cinema for leisure.
75	Mairead Coffey Ref 175829	Hotel and cinema needed.
110	Silviu Ref 093814	Cinema needed.
150	Helen Fitzsimons Ref 200032	There isn't much social infrastructure, The library tries hard and does a great job, but we are a growing town and we have no cinema or theatre.

Chief Executive Response

Please note that submissions relating to the provision of schools, childcare/crèches, healthcare, Active Open Space/Sports Facilities and Playgrounds have been addressed under Chapter 7 Community and Development of the draft LAP. See also Chapter 6 Retail and Opportunity Sites, Issue 3: Provision of a Cinema and Chapter 8 Tourism, Issue 3: Tourism Accommodation.

With regard to the provision of facilities such as cinemas, theatres, community centres etc, it should be noted that the LAP is land use plan only. The draft LAP and County Development Plan 2022-2028 support the provision of such facilities/services and the enhancement of business, retail, leisure, entertainment and cultural uses within town and villages centres, however the purchase of lands and provision / development of such facilities is outside the remit of the LAP and the Local Authority.

In terms of Community Facilities, Chapter 7 of the Wicklow County Development Plan 2022 - 2028 sets out the Community Facilities Hierarchy Model for the county, which sets out the social and community facilities that are considered necessary in settlements of varying sizes, as represented by four levels.

Having regard to the CSO population of 16,439 persons in 2022, the population target and the fact that Wicklow is the county town, it would have a larger catchment of persons travelling to the town from the nearby countryside and local villages for services; Wicklow Town - Rathnew would fall into Level 1 of the Community Facilities Hierarchy Model (Level 1 - 'Settlements with population range

15,000-30,000'). On this basis, Wicklow Town - Rathnew would ideally require the facilities listed in Table 2.3 of the Social Infrastructure Audit, see below:

COMMUNITY FACILITIES HIERARCHY MODEL

LEVEL 1 – SETTLEMENTS WITH POPULATION RANGE 15,000 – 30,000

Multi-purpose Community Resource Centre Regional and Local Indoor Sports and Recreation Facilities Swimming Pool/Leisure Centre Youth Centre Athletics Track and Field Facilities Arts and Cultural Centre Local Multi-Purpose Community Space/Meeting rooms	Outdoor Water Sports Facilities (where applicable) Neighbourhood Parks and Local Parks Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library
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Acceptable rural catchment commuting time by car: 30 min

In terms of actual provision of such facilities the Social Infrastructure Audit has identified the following current provision and shortfalls.

Community Facility Hierarchy Level 1	Existing Community Facilities
Multi-purpose Community Resource Centre	St Brigid's Community Hall, Rathnew. Assembly Hall, Wicklow Town. Parochial Hall, Wicklow Town
Regional and Local Indoor Sports and Recreation Facilities	Kidzone Wicklow Town Spotlight Studios, Wicklow Town
Swimming Pool/Leisure Centre	Coral Leisure Wicklow Town
Youth Centre	The Parochial Hall, Wicklow Town
Athletics Track and Field Facilities	No athletics track and field facilities
Arts and Cultural Centre	Wicklow Gaol, Wicklow Town Wicklow Library, Wicklow Town
Local Multi-Purpose Community Space/Meeting rooms	Hillview Community Centre, Wicklow Town
Outdoor Water Sports Facilities (where applicable)	Multiple clubs operate from Wicklow Town sea front (e.g. sailing, kayaking, swimming, sub aqua)
Neighbourhood Parks and Local Parks	Murrough skate park / outdoor gym / dog park Wicklow Town
Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt	Wicklow hockey club
Playground(s)	Ballynerrin Playground Wicklow Town, Rathnew Playground, The Murrough Playground
Playing Pitches	Wicklow Rugby Ground, Ashtown Lane St Patrick's GAA Club, Wicklow Town, Wicklow Town AFC, Finley Park, Wicklow Town Wicklow Rovers AFC, Wicklow Town Wicklow Rovers AFC Rocky Road Pitch Hockey Pitches (East Glendalough School, Dominican Convent Wicklow), Rathnew AFC ground, Rathnew GAA ground, Wicklow Golf Club, Wicklow Tennis Club
Alternative/Minority Sports Facilities	FYI Dance Club, Wicklow Town Wicklow school of Dance, Wicklow & Rathnew Polo Wicklow, Wicklow Town Wicklow Hand Ball Alley
Open Space/Urban Woodlands/Nature Areas	The Murrough (including Murrough dog park), Black Castle, Wicklow Outdoor Gym, Abbey grounds, Wicklow Head.
Library	Wicklow Library
Acceptable rural catchment commuting time by car: 30 min	

It should be noted that this is not an exhaustive list and that it is envisaged that as funding allows and the population increases, sufficient critical mass would make the provision of further facilities in the settlement viable. In this regard the population of Wicklow Town is at the lower end of the 15,000- 30,000 population identified under the Community Facilities Hierarchy Model while Bray and Greystones population was at circa 33,000 and 22,000 respectively in 2022.

On foot of this submission, no amendments to the LAP are recommended.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

4.3.12 Appendix 3 Green Infrastructure

4.3.12.1 Issue 1: Protection of Trees in the Settlement

No.	Name	Issues Raised
150	Helen Fitzsimons Ref 200032	Too many trees felled in the town in the last 10 years.
162	Albert Morley Ref 224844	<ul style="list-style-type: none"> ▪ Request to include a provision requiring planning submissions on zoned lands to accommodate the mature trees please ▪ Protect existing trees and hedgerows and incorporate into proposed development
Chief Executive Response		
<p>Submissions which raised concerns with regard to the cultural and historical significance of the trees along Tinakilly Avenue, Tinakilly Avenue itself and Tinakilly House are addressed under Chapter 11 Zoning and Land Use, Section 4.3.10.2 Specific Local Objectives, SLO 2 Tinakilly Newrath of this report.</p> <p>With regard to the general protection of trees throughout the settlement, the Council aims to protect individual trees, groups of trees and woodlands which are of environmental and/or amenity value. Mature trees in the County, whether in groups or individually, should be preserved where possible. The following objectives of the County Development Plan protect trees, CPO 17.18, CPO 17.19, CPO 17.20, CPO 17.21, CPO 17.22 and CPO 17.23.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.12.2 Issue 2: Marlton Linear Park/Green Corridor

No.	Name	Issues Raised
150	Helen Fitzsimons Ref 200032	<ul style="list-style-type: none"> ▪ There is an attempt to make a linear park alongside a stream which runs alongside the borders of The Meadows and Meadow Gate estates, but its original design has been badly affected by revisions and extensions to original plans for the estate. ▪ The plan to make a linear park for biodiversity is theoretically a great idea however it is failing as there is currently no management plan for the park. The Municipal District has no budgets to take them on. ▪ Due to the linear park being unfinished it has become a focus for anti-social behaviour.
Chief Executive Response		
<p>A green corridor is proposed along the Marlton stream that includes a riverine linear park, providing a green link through the Marlton estates. The delivery of this park will be done in phases in tandem with future development on either side.</p> <p>The first section of this linear park was delivered with The Meadows residential area and has been taken in charge however the remainder of the linear park has yet to be completed/delivered and taken in charge. Once the remainder of the park is delivered by the developers and each estate is taken in charge, the maintenance of this amenity will fall under the remit of the Municipal District.</p>		
Chief Executive's Recommendation		
No change to draft Wicklow Town – Rathnew Local Area Plan 2025		

4.3.13 Appendix 4 Strategic Flood Risk Assessment

4.3.13.1 Issue 1: General

No.	Name	Issues Raised
65	Niamh Breslin Ref 135501	Concerns raised that poorly planned new development is giving rise to increased likelihood of flooding and this need to be addressed before more houses are built.
72 87	Anna Pocock Ref 163511 Claire McGettigan Ref 203844	<p>These submission raised similar issues as follows:</p> <ul style="list-style-type: none"> ▪ Concern is raised that Lower Rathnew faces a high risk of flooding and current and proposed developments, including roads and housing, are either directly within or adjacent to these flood-prone zones. ▪ Concern raised that the expansion of impermeable surfaces exacerbates flooding risk through increased surface runoff and reduced water infiltration, and the plan provides for a 'waiver' of responsibility absolving developers and planners of accountability for future flooding impacts. It is suggested that without a comprehensive and well-executed flood mitigation strategy, the area remains vulnerable to severe flooding events.
83 87	Mia Merrigan Ref 202755 Claire McGettigan Ref 203844	<p>These submission raised similar issues as follows:</p> <ul style="list-style-type: none"> ▪ Concerns are raised, with particular reference to Rathnew, that existing and proposed developments with increased density housing, apartment blocks, car parking and roads situated above or directly within the flood prone zones increase the chance and extent of flooding and associated damages to these areas from increased with run off and reduced capacity for water infiltration caused by expansion of impermeable surfaces in these areas. ▪ The submission questions wherever the existing Flood Risk Guidelines are out of date considering significant changes in climate, sea level, housing and questions to adequacy of the data used in the assessment. ▪ Issue is raised with the 'disclaimer' in the SFRA which it is put forward removes the Council's responsibility and accountability for any future flooding. ▪ Concern is raised with respect to the lack of Flood Risk Management Measures and lack of a 'pumphouse' to address the current flooding risks. The submission questions the type and adequacy of the two pumphouse options proposed.
89	Sinéad Ryan Ref 211109	This submission raised concerns about flooding becoming a more regular problem due to ineffective drainage system particularly in the vicinity of lands proposed for new housing development at Tinakilly. The submission provides details of filed flooded in September 2023.
97	Andrew Malone Ref 212613	This submission puts forward that it would be irresponsible to be building at density close to, or on an area of high flood risk and that this would, in theory, put existing structures in harm's way, by removing natural drainage/soakage avenues.
98	Vincent Collard Ref 231629	This submission puts forward that much of Rathnew is on a flood plain and new developments have put extra pressure on the flood plains as they drain into rivers and streams that flow through these flood plains. Attention is drawn to problems some Rathnew households face in obtaining flood cover on their house insurance.

110	Silviu Ref 093814	The coast requires strengthening with rocks
112	Cormac Byrne	Concerns raised as follows: <ul style="list-style-type: none"> ▪ Little consideration has been given to the effects of global warming and sea level rise, particular in the area from Wicklow Town to Newcastle. The OPW maps show this area at risk of significant flooding if coastal defences are not developed. ▪ Permission should not be considered for new residential development in area at risk in the near future

Chief Executive Response

The concerns raised are noted; the likelihood of flooding is increasing as a result of a myriad of factors, including (but not limited to) climate change, rising sea / river levels, inadequate / overflowing storm drainage etc. The Council, along the various state agencies with a role in this area, is committed to implementing all possible strategies and actions to mitigate and adapt to these changes, and to minimise additional risk that could arise from new development. For example, a key component of this plan is the lack of zoning for new residential development of land identified at risk of flooding today or in the future (including long range scenarios).

In this regard, all development proposals within the Wicklow Town-Rathnew Local Area Plan area will be subject to the full range of objectives of the Wicklow County Development Plan 2022-2028 (or any update thereof) as follows:

- CPO 14.01** *To support the implementation of recommendations in the OPW Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.*
- CPO14.02** *To support and facilitate flood management activities, projects or programmes as may arise, including but not limited to those relating to the management of upstream catchments and the use of 'natural water retention' measures¹, **and** ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.*
- CPO14.03** *To recognise the concept of coastal evolution and fluvial flooding as part of our dynamic physical environment, and adopt an adaptive approach to working with these natural processes. The focus of a flood management strategy should not solely be driven by conservation of existing lands; it should recognise that marshes, mud flats and other associated eco-systems evolve and degenerate, and appropriate consideration should be given to the realignment of defences and use of managed retreat and sacrificial flood protection lands to maintain such habitats as part of an overall strategy.*
- CPO 14.04** *To ensure the County's natural coastal defences (beaches, sand dunes, salt marshes and estuary lands) are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.*
- CPO14.05** *To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs, and in particular:*
- *Avoca River (Arklow) Flood Defence Scheme;*
 - *Avoca River (Avoca) Flood Defence Scheme;*
 - *Low cost works in accordance with the OPW's Minor Works Scheme;*
 - *Coastal Protection Projects, where funding allows;*

¹ *Natural Water Retention Measures (NWRM) are multi-functional measures that aim to protect water resources and address water-related challenges by restoring or maintaining ecosystems as well as natural features and characteristics of water bodies using natural means and processes*

and ensure that development proposals support, and do not impede or prevent, progression of such schemes.

CPO 14.06 To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).

CPO 14.07 To prepare new or update existing flood risk assessments and flood zone maps for all zoned lands within the County as part of the review process for Local Area Plans, zoning variations and Small Town Plans, where considered necessary.

CPO 14.08 The zoning of land that has been identified as being at a high or moderate probability of flooding (flood zones A or B) shall be in accordance with the requirements of the Flood Risk Management Guidelines and in particular the 'Justification Test for Development Plans' (as set out in Section 4.23 and Box 4.1 of the Guidelines).

CPO 14.09 Applications for new developments or significant alterations/extension to existing developments **in an area at risk of flooding** shall comply with the following:

- Follow the 'sequential approach' as set out in the Flood Risk Management Guidelines;
- An appropriately detailed flood risk / drainage impact assessment will be required with all planning applications, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site), taking into account all sources of flooding;
- Restrict the types of development permitted in Flood Zone A and Flood Zone B to that which are 'appropriate' to each flood zone, as set out in Tables 3.1 and 3.2 of the Flood Risk Management Guidelines unless the 'plan making justification test' has been applied and passed;
- Where a site has been subject to and satisfied the 'Plan Making Justification Test' development will only be permitted where a proposal complies with the 'Justification Test for Development Management', as set out in Box 5.1 of the Guidelines.
- Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines and the SFRA.

Where flood zone mapping **does not indicate a risk of flooding** but the Planning Authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment will be required to be submitted by an applicant for planning permission and the sequential approach shall be applied as the 'Plan Making Justification Test' will not be satisfied.

CPO 14.10 To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters except where the development can clearly be justified with the Flood Risk Management Guidelines 'Justification Test'.

CPO 14.11 To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.

CPO 14.12 Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.

CPO 14.13 Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.

CPO 14.14 Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.

CPO 14.15 *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

CPO 14.16 *For developments adjacent to all watercourses or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse in accordance with the guidelines in 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland.*

Furthermore, the following objectives relating to flooding and flood risk management are included in the Draft Wicklow Town –Rathnew LAP Written Statement:

WTR82 *To ensure the natural coastal defences are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.*

WTR83 *To continue to work with the OPW and other agencies to deliver Flood Defence Schemes and Coastal Erosion Schemes.*

Guidelines & Data sources

The guidelines set out clear and sound principles of the assessment of flood risk and its integration in to the planning process. These principles have not changed in the period since the guidelines were developed.

The Guidelines clearly provide that the most up to date data is considered in any flood risk assessment and in the case of this plan, the data was most recently collected from all sources in 2022 in order to create the flood maps that were presented in the draft plan. In addition, as part of this report, further assessment has been carried out with respect to a new data set in order to re-evaluate whether this new data alters any of the existing assessment (see Addendum I to the SFRA).

As part of the SFRA of the draft plan, maps were also produced showing the OPWs estimate for medium and long term future risk, which takes into account future climate change scenarios. In order to show these more clearly additional maps are proposed to be included in the SFRA in order to aid the public's understanding of the risks.

With respect to the disclaimer, this is a standard disclaimer that is necessary as it is clearly acknowledged in the SFRA that there is inherent uncertainty and assumptions that must be made in the estimates of design flows and flood models.

Insurance

While this is a matter for the insurance companies and the Local Authority / LAP have no input to their decision making, it is correct that there are existing older properties that are located in areas at risk of flooding. As detailed by the OPW *'Insurance companies make commercial decisions on the provision of insurance cover based on their assessment of the risks using their own models and methods. The disclaimer attaching to the OPW Flood Maps makes clear that users of the website must not use the Flood Maps or any other content of the website for commercial purposes. The provision of insurance cover, the level of premiums charged and the policy terms applied are matters for individual insurers.'*

This is a nation-wide issue, that requires a national coordinate response from Government with the insurers.

Local Authorities have been proactive for many years in ensuring, to the best of their knowledge given the data available, that new developments are not located in areas at risk of flooding.

Flood Management Measures

Section 2.6 of the SFRA detailed the OPWs Flood Risk Management Plan for the Avoca – Vartry River Basin. The full and detailed design of this scheme has yet to be determined, and any issues surrounding adequacy of the suggested ‘storage areas’ at Broomhall and Burkeen can be interrogated when this scheme moves towards consent stage, which would include public consultation.

Submission 83 refers in this context to proposed ‘pumphouses’ and it is assumed that this reference is to these suggested ‘storage areas’. If it is not, it is unclear what pumphouse are the subject of the submission, as no surface water / flood water pumping stations are proposed or indicated in this Management Plan or this LAP. The LAP and SFRA does identify the two existing wastewater plants, at Rathnew and the Murrough, but these are not surface / flood water pumphouse.

Coastal Protection / Protection of Infrastructure

The CE notes the concern raised with respect to coastal protection. The provisions of both the Wicklow County Development Plan and the LAP would support additional coastal protection works:

CPO 19.5 *To work with the OPW and any other relevant bodies to address the effects of sea level changes, coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.*

CPO 19.12 *To facilitate the provision of new or the reinforcement of existing coastal defences and protection measures where necessary along the full coastline of the County and in particular to consider the implementation of the measures identified in the Murrough Coastal Protection Study², the draft East Coast Erosion Study³ and any other similar studies that are produced during the lifetime of the plan. To employ soft engineering techniques or natural solutions as an alternative to hard coastal defence works, wherever feasible.*

WTR1 *To ensure the natural coastal defences are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.*

WTR2 *To continue to work with the OPW and other agencies to deliver Flood Defence Schemes and Coastal Erosion Schemes.*

Tinakilly

The information provided with respect to a past flood event in the vicinity in Tinakilly is noted; having regard to the information provided in the submission, the lands that flooded are not proposed for development zoning and are in an area where the SFRA identifies the flood risk.

Chief Executive’s Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025

² 2007, WCC/RPS

³ Irish Rail / ARUP 2020

4.3.13.2 Issue 2: Residential Development in Flood zones

No.	Name	Issues Raised
25	Thomas O'Sullivan Ref 162950	Concern expressed about the building of houses on a flood plain at Tinakilly, Rathnew.
41 45 90	Amy McNabb Ref 152435 Ref 165943 Louiaw McNabb Ref 202834	Concerns raised about flood risk on lands zoned RN2 at SLO4. It is put forward that there is a corner of the field with very soft ground after rain and the flood risk maps shows this area as prone to flooding.
51	Stephen Reynolds Ref 081816	Concern raised about flood risk on lands zoned RN2 at SLO4. It is put forward that an updated flood risk assessment has not been carried out for these lands as with other locations in the plan area; proximity to the wetlands, the coast and sea level rise due to climate change has not been factored in.
55	Paul Walsh	<p>This submission relates to lands located in the Charvey Court housing development in Rathnew, in particular the lands between houses No.'s 3 and 11 (these lands are zoned OS2 in the draft plan).</p> <p>It is put forward that the flood risk present at this location, as shown in the flood risk maps, does not extend to the entirety of the OS2 zone and therefore the zoning of these lands for this OS2 use has not been justified on the basis of flood risk. In addition, it is put forward that a site specific flood risk assessment would likely show a smaller area at actual risk of flooding.</p> <p>It is requested that a sentence be added to the plan that allows for housing on these lands if they can be shown to not be vulnerable to flooding.</p>
81	Bill Clare Ref 191200	The submission raises concerns with flooding in Woodside, Rathnew. It is indicated that surface water from surrounding areas drains to this location and this is affecting the residents, including problem with obtaining insurance. In this regard, concern is raised about the development of future dwellings at Tinakilly; including concerns about additional surface water entering the Rathnew river as a result and the impact on the nature and biodiversity of the watercourse.
83	Mia Merrigan Ref 202755	Future development in Tinakilly should be specified to comprise houses with gardens rather than apartments with car parking as this would reduce run off and contribution to flood risk.
99	Stan Breathnach Ref 000330	<p>Concerns raised about flood risk on lands zoned at SLO4. It is put forward that</p> <ul style="list-style-type: none"> - The topography and geology of the lands has not been adequately considered; there is no bedrock above sea level underlying much of the site so any potential development would be particularly vulnerable to sea level rises - Field below the proposed housing area are already experiencing seasonal flooding as well as being heavily saturated; the estuary is tidal and the soil will become saturated and will be susceptible to subsidence and slippages - A small area of SLO4 is identified as at risk of flooding on the flood maps produced and this isn't addressed in the SFRA

100	Lisa McGettigan Ref 234627	Concern raised with respect to the zoning of lands at SLO2 Tinakilly. It is put forward that high density residential development is proposed on lands classified as Flood Zones A and B, and this is extremely concerning for existing and new residents.
109	Melissa McNabb Ref 093952	Concern raised about flood risk on lands zoned RN2 at SLO4. It is put forward that the fields in SLO4 are marshy soft land and are often flooded after heavy rain. Concern expressed about the proximity of the Murrough flood risk area to future houses.
129	G Kennedy Ref 152438	Concern raised about flood risk on lands zoned SLO4. It is put forward that the development of impermeable surfaced would increase surface water run-off and heighten the risk of flooding, and could also lead to contamination of the Broadlough.
134	Lyndsay Martin Ref 161122	Concern raised about flood risk on lands zoned SLO4. It is put forward that development would increase surface water run-off, raise the risk of flooding and pollution of the Broadlough and surrounding areas.

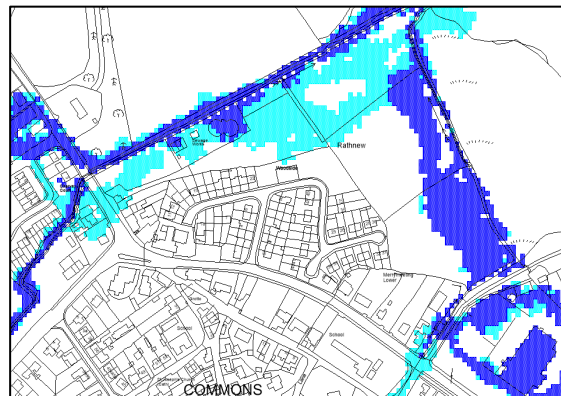
Chief Executive Response

Tinakilly:

The zoned housing lands at Tinakilly, including the lands that are currently under construction, are not identified in any flood studies, either those of the Council or the OPW, the state agency responsible for flood identification and management, as being at risk of flooding, including in the longer term future scenarios developed by the OPW. In terms of new development and the potential for increased run off to the Rathnew River, as set out in part A of this section, the Council is committed to implementing the objectives and standards of the County Development Plan in order to address and mitigate any potential impacts from new development.

With respect to the development format and the suggestion that a lower density type development would mitigate potential risks, in accordance with national and county policy, land that is suitable for residential development should aim for the highest density feasible given settlement designation in the County hierarchy, the site location, services available and characteristics of the area. In this regard, a medium density development is suitable and optimal for the Tinakilly, lands, which incorporates a range of house types and sizes, including duplexes and apartments. However it should be noted that these 'higher' density formats are only a small element of the overall development permitted to date and the emerging plans for the future sections.

The Woodside housing development is located in close proximity to a number of identified flood risk zones, as shown on the image below. In accordance with the application of the objectives and standards of the County Development Plan, existing future development at Tinakilly includes and will include (for later phases) implementation of a range of measures to ensure no increased run off to the watercourses in the area or increased risk of flooding in the area.



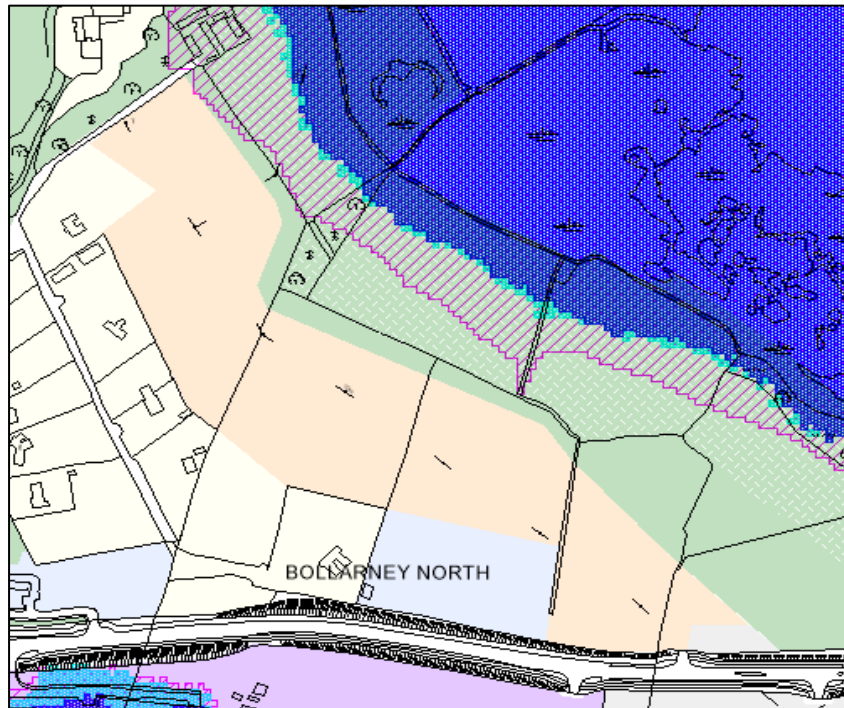
SLO4:

The zoned housing lands at SLO4 are not identified in any flood studies, either those of the Council or the OPW, the state agency responsible for flood identification and management, as being at risk of flooding. Any flood risk areas in the vicinity are located further downhill and east of the proposed residential lands. It is not correct that no updated flood risk assessed has been carried out for these lands - updated flood risk identification maps, commissioned for the recent Wicklow County Development Plan, as well as additional data sources, have been factored into the SFRA carried out for all zoned lands in the draft plan area.

With respect to longer term risk due to climate change, this has also been considered and shown on the SFRA map as areas at risk in the future (with data sourced from the OPW), and again, the lands proposed to be zoned for new residential in this area are not identified as at risk in the medium and long term future scenarios.

The SFRA did not carry out a 'Justification Test' for these lands proposed to be zoned in SLO4 as the flood risk identified in the area coincides with lands proposed to be zoned OS1 and OS2 which are both water compatible land uses.

The image below shows: in dark blue – area currently at 1:100 risk (Flood zone A), in light blue - area currently at 1:1000 risk (Flood Zone B) and in pink - areas of future potential risk. The proposed residential zoning is in orange.

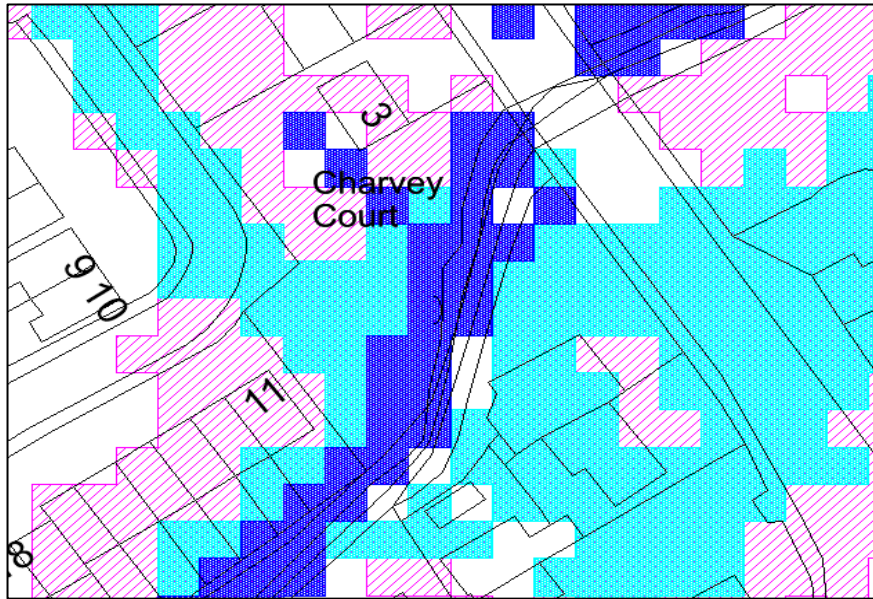


With respect to the potential for increase surface water run-off that could arise from the development of these lands, the Council is committed to the implementation of the objectives and standards set out in the County Development Plan, as detailed in part A of this section, in order to control and manage surface water in new developments.

Charvey Court:

A flood risk corridor has been identified along the Rathnew stream in this area. Any lands identified as flood zones A or B are appropriately zoned OS2, which limits development and aims to leave the lands in their natural state. The submission is correct that there are also some areas beyond the A and B flood zones that are proposed for OS2 zoning in the draft plan; however these are very minimal and would not be adequate in size to accommodate the development of a dwelling. Furthermore, when one considers the OPW future scenarios maps of flood risk, the entire area is potentially at risk.

The image below shows: in dark blue – area currently at 1:100 risk (Flood zone A), in light blue - area currently at 1:1000 risk (Flood Zone B) and in pink - areas of future potential risk.



In addition, all of these undeveloped lands that are within 25m of the river and are appropriately zoned OS2 in order to be consistent with Wicklow County Development Plan objective 17.26 i.e.

CPO 17.26 *Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.*

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025, however on foot of these and other submissions, it is proposed to produce additional flood risk identification maps so that the public can be better informed.

4.3.13.3 Issue 3: Open Space

No.	Name	Issues Raised
24	Henry & Aoife Clarke Seamus & Evelyn Ryan David & Caroline O'Neill Ref 185913	Lands proposed to be zoned for 'Open Space' in and around Rathnew, Tinakilly and Newrath are not readily useable or developable for that purpose due to flood risk on the lands. Rathnew and the surrounding areas have been heavily developed in recent years and there is now a real lack of any usable green open spaces for the benefit of the community at large.
38	Mary Byrne, Liz Byrne, Carmel Whelan Ref 131457	This submission relates to lands located on the R752 west of Rathnew village centre (these lands are zoned RN2 and OS in the draft plan as part of SLO3). A question has been raised with respect to the interpretation of OS2 zoning at DM stage, if it can be shown that the lands do not flood via a site specific flood risk assessment.
55	Paul Walsh	This submission relates to lands located in the Charvey Court housing development in Rathnew, in particular the lands between houses No.'s 3 and 11 (these lands are zoned OS2 in the draft plan. A question has been raised with respect to the interpretation of OS2 zoning at DM stage, if it can be shown that the lands do not flood via a site specific flood risk assessment.
83	Mia Merrigan Ref 202755	The role of the existing avenue to Tinakilly House as a 'sponge' to absorb surface water run-off in the area is raised; it is put forward that alterations proposed to the avenue including removal of mature trees will reduce this capacity.

Chief Executive Response

Open Space around Rathnew, Tinakilly and Newrath:

Lands zoned for 'AOS – Active Open Space' are explicitly designated for the development for active sport and amenity uses. There are no lands zoned in the draft LAP for AOS in the Rathnew, Tinakilly and Newrath areas that are at risk of flooding.

There is c. 40ha zoned for OS1 use (more informal parks and casual play areas) in the draft plan in the Rathnew area, of which c. 12-15ha may be at risk of flooding. It is clear therefore that substantial, flood risk free lands therefore are provided for this use.

Lands identified as OS2, some of which are at risk of flooding, are not identified for human use, and have been given that zoning precisely because of the flood risk and other designation that apply, that make the land unsuitable for human activity and benefit.

OS2 interpretation:

When the OS2 zone category was first drawn up and utilised, it was to cover flood plains, buffer zones along protected sites etc. However, as the Council only had preliminary flood risk assessment maps (PFRAs) at that time, the Council could not be fully confident that all such lands were definitively at risk of flooding, and a proviso was included that development could be considered on OS2 if the development could show no flood risk, no adverse impacts on protected sites etc

However this was changed in the 2022 County Development Plan as a more detailed set of flood maps and more accurate assessment of buffers along protected sites was available, as well as our 25m set back from watercourses policy.

Now OS2 is not open to other development and the definition in the County Development Plan is '*To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones*

along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity'. 'Uses appropriate for passive open space (OS2) zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. The development of these lands for recreational uses may only be considered where such use is shown to not undermine the purpose of this zoning'.

This has been carried forward into the new LAP. Therefore residential or other forms of built development as not permissible in OS2 zones.

Note: With respect to these submissions re OS2 and flood risk, an inconsistency between the plan text and map has been determined; in some locations where the land zoning is OS2 and is thus stated in the text, on the map it is shown as OS1. This requires correction and requires to be a formal material amendment for the sake of clarity.

Tinakilly Avenue

This LAP does not set out objectives for the removal of this avenue or trees thereon, other than to facilitate the development of the RIRR. The lands along this full length of the avenue are proposed to be zoned 'open space'. While the route of the RIRR would cut across this avenue, this would not significantly reduce its overall area and absorptive qualities.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025 however the following is required:

Error correction – Proposed Material Amendment

- (a) All locations shown on the map as OS1 shall be corrected to OS2 where
 - The lands are located in the flood zone
 - The lands are host to natural habitats

4.3.13.4 Issue 4: Infrastructure

No.	Name	Issues Raised
60	Peter Dignam Ref 121504	Concerns raised that water and sewerage infrastructure is at capacity and struggling to meet current population needs and this in turn heightens the risk of flooding and ecological damage to rivers, lakes and coastal waters.
72	Anna Pocock Ref 163511	Concern raised with respect to the location of the Rathnew Inner Relief Road across a flood zone
83	Mia Merrigan Ref 202755	Concern raised with respect to the location of the Rathnew Inner Relief Road across a flood zone. It is put forward this road is not essential infrastructure as there are alternative routes possible for alleviating traffic flows in Rathnew.
112	Cormac Byrne	Concern raised that inadequate consideration has been given to the protection of vital infrastructure such as roads and rail lines with regard to probability of rising water levels.

Chief Executive Response

Drainage infrastructure:

It is not fully clear from the submission what the concern is in relation of flood risk, but in accordance with the data from Uisce Eireann, there are no current overall capacity issues in the water supply and wastewater treatment infrastructure in the plan area, and there is adequate capacity to accommodate the future growth envisaged by the plan. It is acknowledged that some areas in the plan are not currently served by the public sewer network and depending on the size and type of development proposed, local capacity constraints in the network may require local up sizing, or extensions of network, to the existing wastewater network.

The concern may arise with respect to surface water drainage and the consequences of additional surface water from new developments being discharged into local watercourses. In this regard, the following County Development Plan objectives will continue to be implemented in the plan area:

- CPO 14.11** *To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.*
- CPO 14.12** *Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.*
- CPO 14.13** *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*
- CPO 14.14** *Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.*
- CPO 14.15** *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

RIRR:

The route of the RIRR passes over the Rathnew river. The SFRA carried out has demonstrated how and why this crossing is justified and must be managed in order to ensure no increased risk of flooding. It

is agreed that a number of road improvement projects are necessary in order to improve traffic flows in and around the overall settlement of Wicklow Town - Rathnew, but the RIRR is considered an essential element of the overall strategy and in particular, would potentially bring significant benefits to the village centre of Rathnew, allowing for regeneration of the village centre and public realm improvements.

Protection of Infrastructure

Section 2.6 of the SFRA detailed the OPWs Flood Risk Management Plan for the Avoca – Vartry River Basin. In 2018, the Office of Public Works published a Flood Risk Management Plan for the Avoca- Vartry River Basin. Both Wicklow Town and Rathnew were included in this plan as Areas for Further Assessment (AFA). Alongside a recommendation of various general measures, Section 7.4 of the Avoca-Vartry FRMP sets out proposed measures for each area identified as an AFA. Measures included for the Wicklow AFA and Ashford & Rathnew AFA, which is largely consistent with the area of the Wicklow Town-Rathnew Local Area Plan 2025, are described as follows:

'Description of the Proposed Measure:

Potentially viable flood relief works for Wicklow, Ashford and Rathnew that may be implemented after project-level assessment and planning or Exhibition and confirmation might include physical works, such as a series of hard defences, storage and improvement of channel conveyance. The hard defences would protect to the 1% AEP fluvial flood event, with an average height of 1.1m (reaching a maximum height of 1.5m) and a total length of 4km. The two storage areas on the Broomhall and Burkeen catchments have a total capacity of approximately 14,800m³. The improvement of channel conveyance consists of the removal of a weir on the Ballynerrin watercourse. The potentially viable flood relief works, which at this stage of assessment are deemed to be preferred, are set out in Appendix G, noting that these will be subject to project-level assessment and possible amendment.'

Irish Rail is undertaking the East Coast Railway Infrastructure Protection Project (ECRIPP) with the aim to address and implement protection of the existing railway and coastal infrastructure against the further effects of coastal erosion due to climate change in five key areas on the railway line between Dublin and Wicklow. The plan area is in ECRIPP Coastal Cells CCA6.2 (Newcastle to Wicklow). The project is in Phase 2 - Project Concept, Feasibility and Option Selection.

Chief Executive's Recommendation

No change to draft Wicklow Town – Rathnew Local Area Plan 2025