



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Lusra Teo
Reference:	DWTRLAP-183127
Submission Made	November 20, 2024 6:32 PM

Topic

Overall Vision and Strategy of LAP

Submission

Please see submission attached.

Topic

Residential Development

Submission

Please see submission attached.

Topic

Economic Development

Submission

Please see submission attached.

Topic

Land Use Zoning Map

Submission

Please see submission attached.

File

Lusra Teo - Marlton Area Submission.pdf, 0.9MB

Wicklow Town – Rathnew LAP,
Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96

20th November 2024

**Re: Submission to the Draft Wicklow Town – Rathnew Local Area Plan 2025
Lands at Marlton Equestrian, Marlton Road, Ballynerrin Lower, Co. Wicklow**

Dear Sir/Madam,

On behalf of Lusra Teo Marlton House, Marlton Road, Wicklow Town owners of lands at Marlton Stud, Marlton Road, and at Ballynerrin Lower, we wish to make a submission in respect of the Draft Wicklow Town – Rathnew Local Area Plan 2025 (WRLAP).

The lands subject of this submission are outlined in Red on Figure 1 below. However, these lands do not represent the entirety of the Lusra Teo ownership of lands within the Wicklow-Rathnew area to be covered by the next WRLAP. Lusra Teo have been very active developers of Residential and Employment lands and associated infrastructure within the plan area for many decades and have made a significant contribution to the sustainable development of Wicklow and Rathnew at Marlton and at Ballybeg and have an extant permission on a landholding at Ballynabarny.

Marlton House and attendant lands was for decades the base for Marlton Equestrian, an internationally successful elite equestrian breeding and training facility with associated riding school facilities and structures. Recognising the urban encroachment to the south of Wicklow Town over several decades and particularly influenced by the preparation of the previous WRLAP, whereby lands at Marlton were zoned, Marlton Equestrian has commenced the process of relocating to Ballymote, Glenealy.

As a result, significant lands will now come into play for logical development and a Masterplan approach has been adopted, based on an intimate knowledge of the landforms, the development patterns in the vicinity and the appropriate needs evident within their landholdings to the south of Wicklow town.

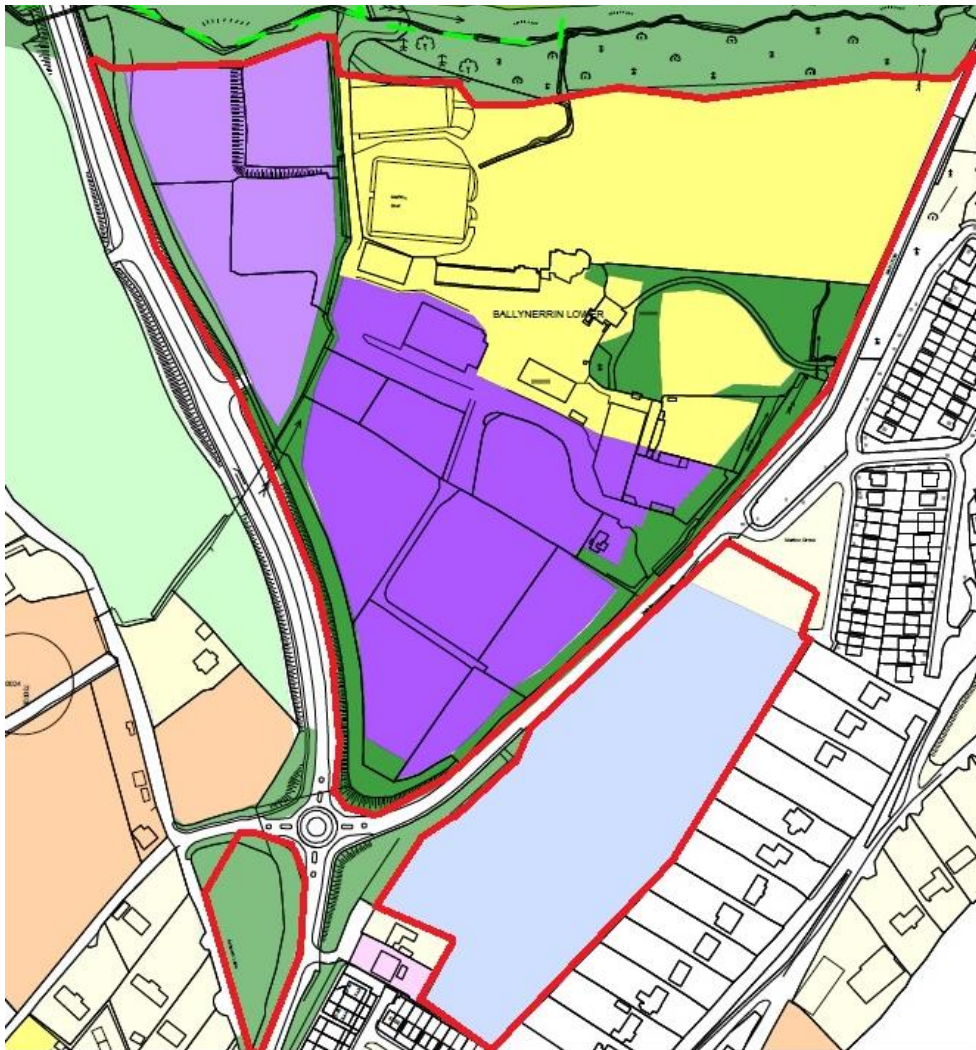


Figure 1 Extract from the Draft WRLAP Zoning Map with Lusra Lands identified in Red

The following information provided by Lusra indicates the contribution made by the company to providing the social and community facilities and infrastructure required to develop out the area in accordance with the principles of the Marlton LAP. Along with substantial residential developments, Lusra has also contributed to the development in the Marlton and Ballybeg and Ballynabarney (extant planning permission) areas of Wicklow Town in other ways.

During the period of the AA6 LAP Lusra Teo has: -

- Developed 10Ha of R1 Lands;
- Developed a further 3Ha of R2 lands;
- Obtained planning for a further 3.5 Ha to include a Neighbourhood centre;
- Submitted for Planning Permission in planning for a further 2.5Ha.

In addition, Lusra Teo have contributed to infrastructure development within the WRDP area, including: -

- 5.5ha residentially zoned land allocated to provide part of the Town Relief Road (TRR);
- 0.5ha allocated to facilitate the construction of part of Saunders Lane adjacent to the Village Mill Enterprise Center, Rathnew;
- 1.6ha of Residential Zoned lands sold to the Dept. of Education (DES) to facilitate the construction of the Wicklow Educate Together National School at a very substantial discount over its value as a residential site;
- 1.2ha to provide the Link Road connecting Marlton Road to the TRR to facilitate school children and people heading north;
- Extensive lands circa 4.5Ha provided for general leisure (Green Space) along the Marlton Stream Riverine Walk;
- 5.1ha between Hawkstown Road and Ashtown Lane sold at discount to agricultural value to WCC, Zoned AOS, for Active Open Space;
- Planning permission has been granted for a Neighbourhood Centre under WCC Ref. 24/237 with a Final Grant issued on 23/07/2024, construction of which will start shortly.
- The relevant sections of the TRR have been provided and are in charge and in use.

The lands subject of this submission, generally mapped below, are the lands south of the Marlton Stream Riverine Park indicated on the extract from the previous WRLAP 2013 – 2019 and have been progressively developed in accordance with the previous Action Plan 6, outlined Light Blue.

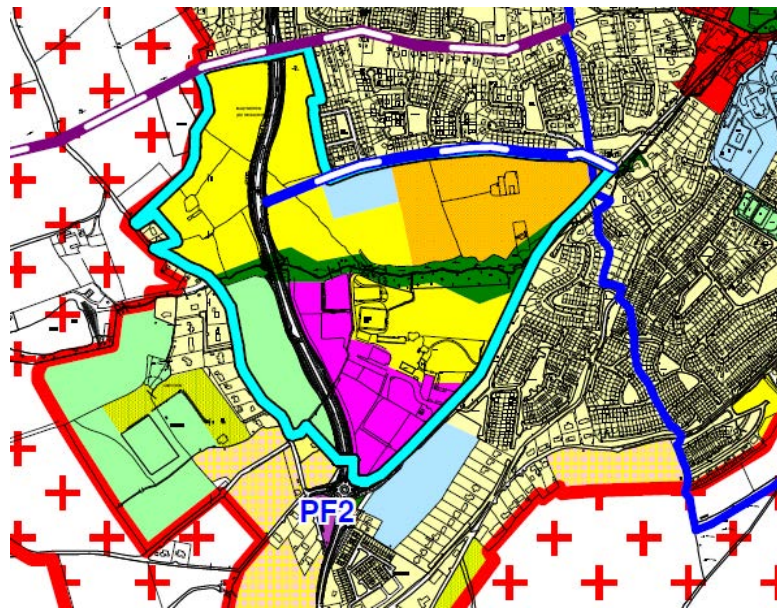


Figure 2 Extract from the WRLAP Zoning Map 2013-2019

The lands subject of this submission are outlined in Red in the extract from the draft WRLAP 2025 Zoning Map in Figure 3 below. The subject sites are identified with lettering A – L.

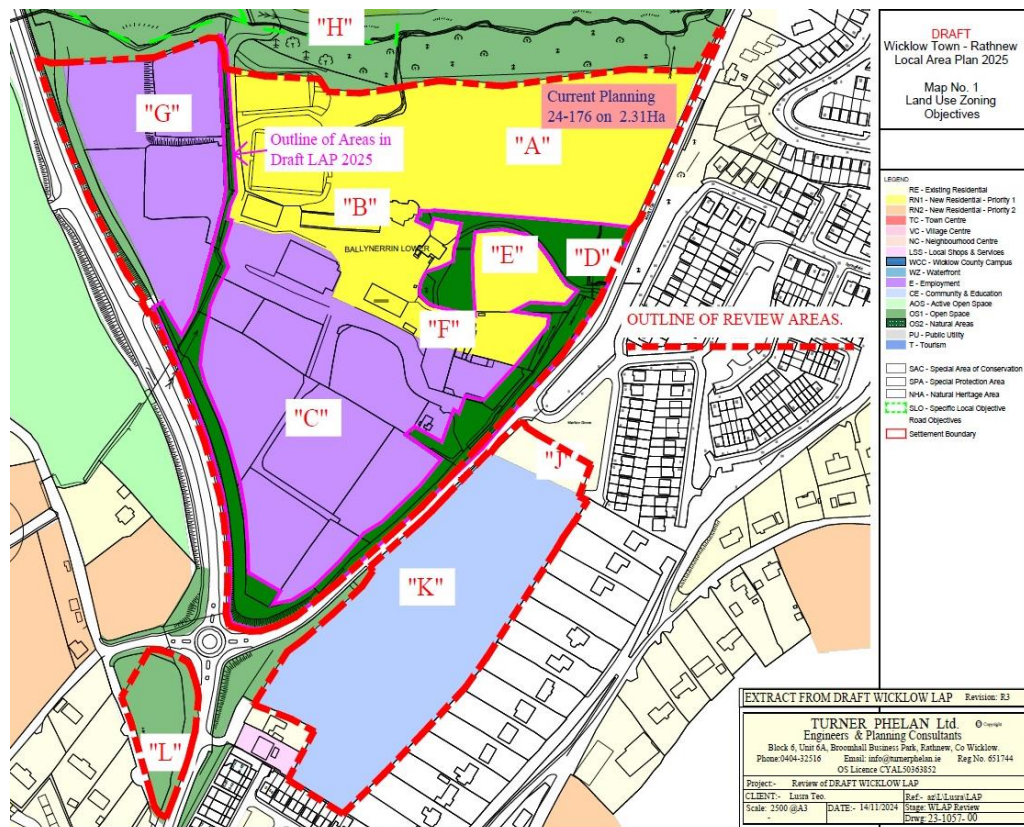


Figure 3 Extract from the Draft WRLAP Zoning Map with Sites Identified

The main changes already made in the draft LAP, as they relate to the subject area, have been noted and include: -

- Change to the OS zoning alignment along the Marlton Stream, with adjustment to the Residential Zoning boundary (Site A, B and H).
- Proposed R1 zoning indicated in the draft LAP is retained with minimal adjustment (Site B).
- Additional Open Space is proposed on lands previously zoned R1 (Site D, E and F).
- Some more linear open space has been added to the west and south, alongside Hawkstown Road, incorporating mature trees (bordering Site C and G) and an extensive linear area along the Marlton Road to the east.
- An extensive area to the west was zoned E&E – Retail Warehousing (E3). These lands have been rezoned to E – Employment zoning in the draft LAP (Site C and G).
- An area zoned R1 has been maintained adjacent to existing residential developments, which is accepted (Site J).
- Community and Education (CE) zoning has been maintained on lands located to the south of Marlton Road (Site K).
- An area to the south which was zoned E&E with a specific objective for a Petrol Filling Station (PF2) has been rezoned to OS (Site L).

This submission proposes an alternative masterplan for the progressive redevelopment of the Marlton lands south of the Marlton Stream, as shown in the Masterplan drawing prepared by Turner Phelan Ltd. Consulting engineers and planning consultants in Figure 4 below.

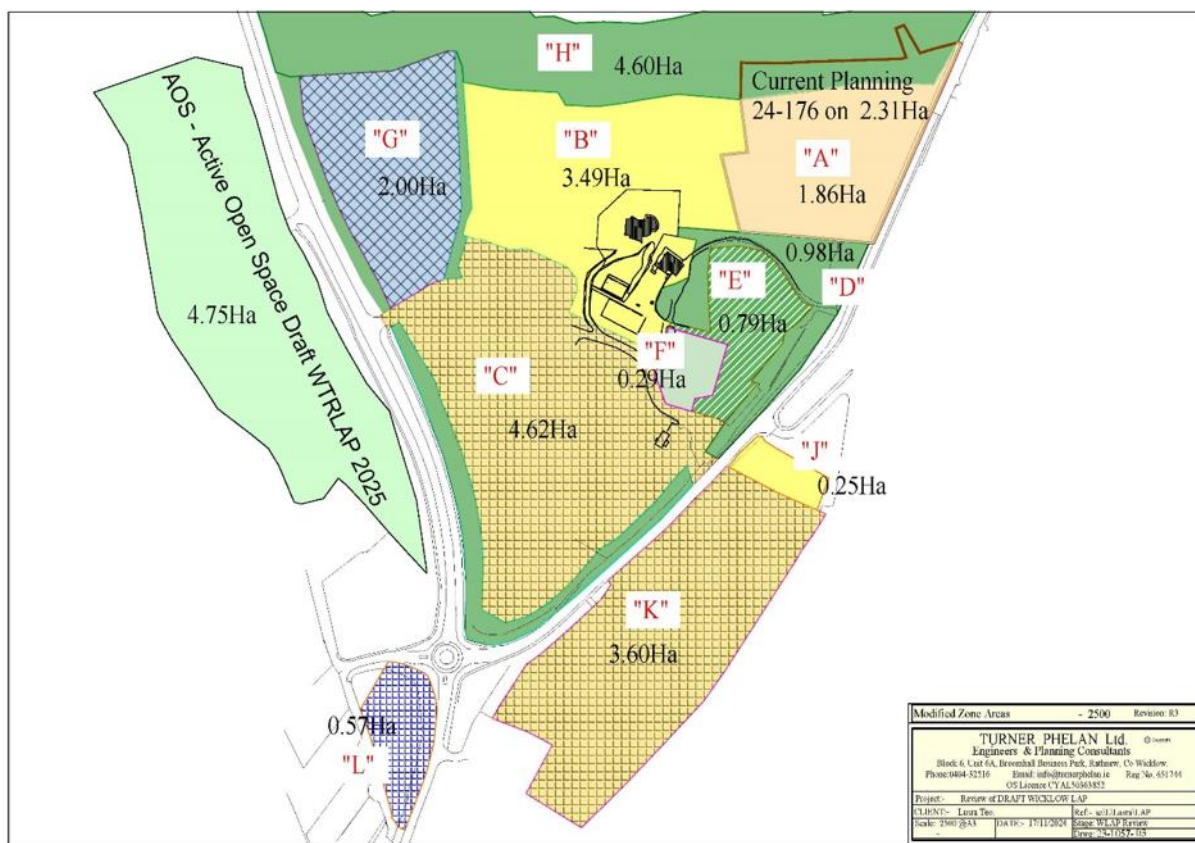


Figure 4 Masterplan of Land Use Zoning Changes Prepared by Turner Phelan

The proposed land use masterplan structure, which it is requested to be adopted into zoning, is explained below.

Site A

The area of the Planning Application Ref. 24/176 is shown in the northeast sector fringed to the north by the continuous linear park along the Marlton Stream (Site A). The additional open space alignment is accepted and is reflected in a revised layout submitted as RFI to Wicklow County Council under Ref. 24/176.

Site B

The proposed R1 zoning indicated in the draft LAP is retained with minimal adjustment, indicated as an area of 3.49ha (Site B).

Sites C and G

Sites C and G are proposed for re-zoning to Employment in the draft LAP.

It is proposed that the Employment zoning be removed from this part of the town. It is submitted there is a far more successful take up of employment land in the northwest sector at Ballybeg, Broomhall and Ballynabarny, where employment zoning should be consolidated. The location at Site C and G is unsuitable for employment uses and associated high volumes of HGV traffic in an otherwise predominantly residential neighbourhood and due to the proximity to the Wicklow Town Centre, TRR, link road, proposed AOS and schools.

A separate submission, made on behalf of Lusra Teo, requests that a similar area of land in the northwest sector, at Ballynabarny, located within the M11 Corridor, be zoned for Employment. The lands identified in that submission would provide an extension of the existing Employment uses consolidated in that area and would rebalance employment provision within the overall WRLAP area.

In light of the above it is proposed that the land indicated in the draft WRLAP for E – Employment use in the Marlton Sector be sub-divided into two areas now designated C & G in the submitted Masterplan, as follows: -

Site C - These lands are unique in their location being naturally adjacent to and within easy walking distance to existing Residential, Schools, Parkland and the Town Centre. These lands are requested to be redesignated as R1 lands (4.62ha). The availability of services, their proximity to the Town Centre and transport with buses passing the frontage regularly, heading both north and south, makes these lands ideally suitable for residential development. Also, their close proximity to the Marlton River Line Park and the proposed additional Parkland and community facilities located at D, E and F makes them a natural fit to the sustainable development of the area.

Site G

It is proposed that Site G be re-zoned for Community and Education, as explained further under Site K below. It is proposed that the CE zoning be relocated onto Site G (c.2.3ha). This site meets all the DES Site Suitability Assessment (SSA) Guidelines, making it the most suitable school site within the Wicklow Town Environs. It also has the benefit of being located adjacent Marlton Stream Riverwalk Park for nature walks etc. Furthermore, it is located opposite the lands zoned for AOS, which are in the ownership of WCC. The DES SSA guideline TGD – 25 requires, inter alia, land to be suitably zoned in statutory plans.

Site D, E and F

Immediately south of the site under consideration in Planning Ref. 24/176 is a proposed new zoning of c.2ha for OS. It is a former landscaped large private parkland area and has been designated in the Masterplan as suitable for OS based on an arboriculture assessment and its potential for reinstatement as a Public Park.

Within that area exists a substantial existing large agricultural building (approx. 1350m²) currently used as a grain and general farm store that can be converted into indoor active and passive recreation, subject to planning permission and in accordance with the revised zoning land use matrix.

Site J

As indicated above, the zoning on Site J is accepted.

Site K

It is submitted that it is inappropriate to maintain the Community and Education zoning on this land as it has been pointed out repeatedly by the landowner that the land profile and access is unsuitable for school use and does not meet Department of Education land suitability criteria in respect of suitability assessment, by reference to the DES Technical Guidance Document (TGD – 025), Section 3, Site Suitability Criteria, including (iii) - Ground conditions should be reasonably level, not requiring extensive excavation or fill – steeply sloping sites should be avoided (generally with slopes >4%).

As indicated above, it is proposed that the CE zoning be relocated onto Site G. It is proposed that the site be returned to its residential zoning it had in an earlier LAPs. It is requested that the lands be zoned R1.

Site L

This site is proposed for re-zoning to Open Space in the draft LAP from the previous SLO PF 2 designation. In the previous plan it was zoned for a strategic purpose, PF 2 to balance the provision of Service Station locations in the urban area, as while there are already a number of service stations to the north of the town there are none to the south.

As this site adjoins the Hawkstown Roundabout, the R751, Ashtown Lane and the TRR, it is in an ideal location. Now that the critical mass of residential developments is coming on stream, the volume has expanded to a degree that the potential viability of the service station is sufficient to attract investment and currently, there are several interested parties.

As an Open Space, the isolated site has little practical suitability for active or passive recreation as it is fundamentally an island surrounded by busy roads and a roundabout accessing Wicklow from the motorway. It is, therefore, practically inaccessible and unsafe for use as Open Space. No particular explanation is given in the draft LAP as to why this is designated for OS, or that there is an identified shortfall of OS in Wicklow to justify this zoning change. In any event, even if there was a shortfall, this land is totally unsuitable for development as Open Space.

Conclusion and Request

It is submitted that the masterplan-based redistribution of land use classes indicates a more practical redistribution of zoning that would better integrate services and amenities in conjunction with more compact residential development and without altering the Core Strategy allocation to Wicklow/Rathnew and indicating a longer-term strategy for consolidating compact residential neighbourhood development and supporting amenities in this part of town with employment allocation rebalanced in a strategic location to the north west of the joint urban area.

It is requested that this submission be taken into account in the preparation of the WRLAP in 2025.

The stakeholders are willing to engage with the planning team should any issues require clarification during the preparation of the CE Report or in the preparation of the final plan.

Simon Clear