



## Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	State Body
Name:	The Land Development Agency
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### File

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20 November 2024

**RE: Draft Wicklow Town – Rathnew Local Area Plan 2025 (Variation No. 2 of the Wicklow County Development Plan 2022 – 2028)**

A Chara,

The Land Development Agency (LDA) welcomes the opportunity to participate and engage with Wicklow County Council on the preparation of a new Local Area Plan (LAP) for Wicklow Town - Rathnew. The LDA is a commercial, state-sponsored, body set up by the Government with two main functions:

- To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and
- To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability.

**Role and Purpose of the Land Development Agency (LDA)**

The enactment of the Land Development Agency Act 2021, which established the LDA, marked a historic move to identify and use certain relevant public lands to provide for housing and affordability needs into the future. It is imperative that the ability of state lands to deliver residential development forms part of policy in County Development Plans, as supported by Local Area Plans, and that role and mandate of the LDA is recognised as a key part of this delivery.

The primary function of the LDA is to progress the development and regeneration of large-scale, strategic sites to increase the supply of housing in the State, particularly affordable and social housing. It is considered that a significant amount new development in the coming years in our cities and towns will be large-scale regenerative projects. As part of this regeneration, the LDA is committed to the delivery of quality cost rental homes, at scale.

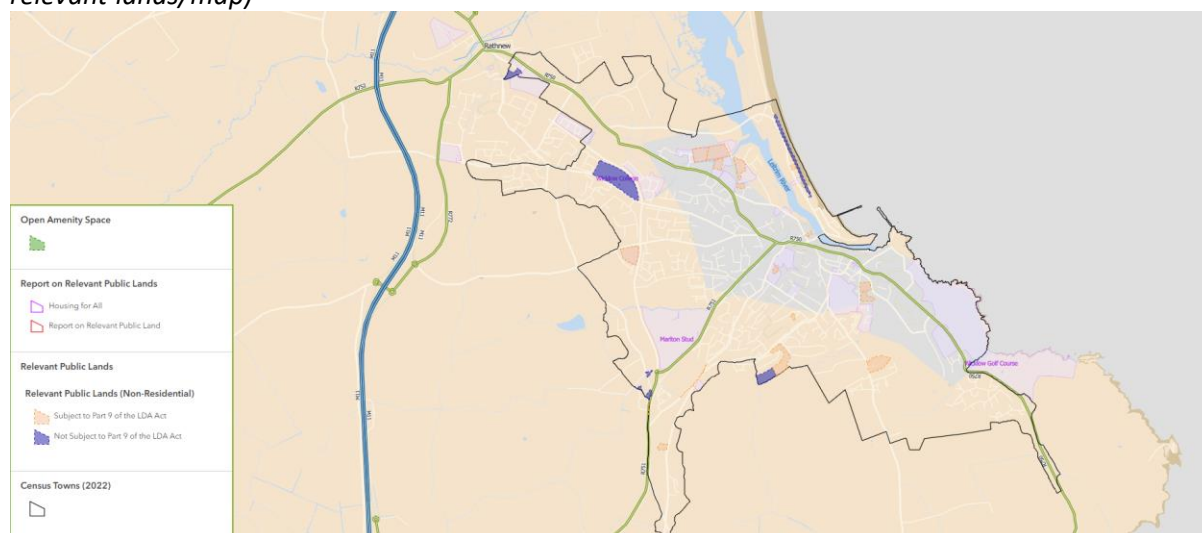
Cost rental is a new rental tenure product for Ireland that is supported by the Department of Housing, Local Government, and Heritage and the Affordable Housing Act 2021. As an emerging rental option, it is noted that cost rental is not widely understood as a tenure type by decision-makers or the public. Cost rental housing provides affordable rented accommodation to people on middle incomes (net household income below €66,000 per annum for Dublin and €59,000 for everywhere else in the country). It is aimed at people who are above the threshold for social housing but have difficulty affording private rented accommodation or purchasing a home.

With cost rental, rent covers the cost of the construction, management, and maintenance of the new home, with rents to be set at least 25% below regular market rents. Cost rental offers a long-term, secure tenancy that is more affordable. Over the period up to 2026, Housing for All commits to the delivery of 10,000 cost-rental homes in urban centres by local authorities, Approved Housing Bodies (AHBs), and the LDA.

### Register of Relevant Lands and Report on Relevant Public Land

It is noted that Wicklow Town is classified as a census town and is therefore being reviewed as part of the LDA's ongoing work assessing relevant public lands for development potential. The Register of Relevant Lands and Report on Relevant Public Land facilitate the identification and assessment of the potential of relevant public land to provide affordable housing both now and in the future. As part of the first round of assessment in 2023, Wicklow Town was identified as a census town. Wicklow Town will be assessed for the potential delivery of housing on relevant public lands as part of the second round of assessment, a report on which will be published early in 2025. The Register of Relevant Lands Map is publicly available online, and the LDA encourage Wicklow County Council to refer to this map to ensure that lands identified are subject to appropriate zoning objectives that would facilitate future residential development.

Figure 1: Extract of Register of Relevant Public Lands Map (<https://lda.ie/public-lands/register-of-relevant-lands/map>)



### **Residential Development**

In keeping with the overarching principles of the National Planning Framework (currently under review), the Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy (RSES) (which recognises Wicklow as a Key Town within the Gateway Region), the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) and other relevant policy documents and Section 28 Guidelines, the LDA is committed to the concept of compact growth and brownfield development. In this regard, the LDA welcome Objectives within the Draft Plan which seek to consolidate the town centre, in particular the stated lack of quantitative restrictions on unit numbers to be delivered on town/village centre zoned lands. This eases the delivery of appropriate unit numbers and densities at the most suitable locations.

As a state-sponsored house builder, the LDA can assist Wicklow County Council in achieving the Residential Objectives set out in Chapter 3 of the Draft Plan. It is respectfully suggested that reference to the LDA in Chapter 3 would assist in informing the public about the LDA's role and remit, as well as

providing a strengthened position for the LDA's work within the policy framework of Wicklow County. The following wording is recommended:

*The Land Development Agency (LDA), a commercial, state-sponsored, body established following the enactment of the Land Development Agency Act 2021, has two main functions:*

- To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and*
- To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability.*

*The LDA are primarily involved in the delivery of affordable and cost-rental residential development. Wicklow County Council will work collaboratively with the LDA to support and facilitate the consolidation and development of strategically located land banks, particularly publicly owned lands, to unlock housing and regeneration opportunities.*

Supplementary to the above, it is considered that inclusion of an objective under the Residential Development Strategy, contained at Section 2.4, promoting the delivery of a range of housing types and tenures, would assist in providing a broader range of residential development types in Wicklow Town – Rathnew, in support of the varying needs of the area's residents, addressing issues of affordability. Wording to the effect of the following is suggested:

*To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, in order to cater for the varying housing needs and economic circumstances of the town's population.*

Furthermore, it is respectfully suggested that a Residential Objective supporting the work of the LDA should be included, to provide a policy basis for any future development that the LDA may bring forward in the town. An objective could make reference to the delivery of affordable and cost-rental housing types, which can be delivered by the LDA and other relevant housing stakeholders, such as Approved Housing Bodies (ABH's). The below wording is recommended:

*WTR6: Wicklow County Council shall work with The Land Development Agency, and other relevant stakeholders, to deliver a range of residential tenures to meet the requirements of the population. Wicklow County Council will support the delivery of affordable and cost-rental housing types on appropriate lands, subject to compliance with the policies and objectives of the LAP, the Development Plan and other relevant national and regional policies and guidelines.*

The LDA wishes to state support for the overall objective of the residential development strategy of the Draft LAP, in prioritising the development of appropriate central sites, and edge of centre locations, above out of centre sites which would promote the sprawl of the settlement area. In further support of compact settlement, it is suggested that reference to the appropriate density ranges, as specified in the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) may be useful to inform developers and the public of acceptable ranges for different areas within the relevant settlement boundary.

The LDA is committed to delivering developments that are designed to encourage a more sustainable form of living, creating new communities in tandem with the delivery or enhancement of existing services and amenities, in a manner which promotes sustainability and a transition away from a reliance on private vehicles. The National Planning Framework, National Development Plan, S28 Guidelines for Planning Authorities, and Regional Spatial and Economic Strategies, share the objective

of facilitating and promoting more sustainable transport. In addition, the Climate Action Plan is also seeking to reduce transport carbon emissions by 20% which will include reductions in travel demand and journeys by private car. The LDA notes objective WTR2 and supports the prioritisation of development along public transport routes that will assist in achieving the ambitions of these policies and guidelines.

The LDA notes the recent, ongoing, consultation with regard to Revision 1 of the National Planning Framework (NPF) and acknowledges the LAP's drafting so as not to require future amendments on foot of forthcoming population and housing targets.

### **Conclusion**

The LDA supports Wicklow County Council in the progression and ultimate implementation of a Local Area Plan for the Wicklow Town – Rathnew area. The LDA requests that this submission is taken into consideration, and, where appropriate, amendments are made to the text and objectives of the LAP to further strengthen the policy framework for the sustainable development of Wicklow Town – Rathnew, and the delivery of affordable housing opportunities at appropriate sites.

The LDA look forward to working with Wicklow County Council, and other stakeholders, to promote and progress the development of state land to provide sustainable residential communities.

Yours faithfully,

*Aoife O'Connor-Massingham*

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