



# Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Ardale Property Group
Reference:	DWTRLAP-092310
Submission Made	November 20, 2024 9:25 AM

## Topic

Residential Development

## Submission

Please see submission attached.

## Topic

Land Use Zoning Map

## Submission

Please see submission attached.

## File

Ardale Draft WTR LAP Mariners Submission.pdf, 1.58MB

**Draft Wicklow Town – Rathnew  
Local Area Plan 2025 Submission**

On behalf of

**ARDALE**

**Ardale Property Group**

November 2024



Planning & Development Consultants

63 York Road,

Dun Laoghaire

Co. Dublin

[www.brockmcclure.ie](http://www.brockmcclure.ie)



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## 1 Executive Summary

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin have been instructed by our client, **Ardale Property Group, Unit B4, Oakfield Industrial Estate, Ninth Lock Road, Clondalkin, D22 XS28**, to make this submission in response to the Draft Wicklow Town – Rathnew Local Area Plan 2025.

We note the relevant submission date is **20<sup>th</sup> November 2024** in this case and this submission is lodged within that timeframe.

On 9<sup>th</sup> October 2024 Wicklow County Council (WCC) published the Draft Wicklow Town – Rathnew Development Plan 2025. Our client welcomes the opportunity to provide a submission and to engage on the future direction of the Town and we trust our input will be considered during the formulation of the final Plan and future development of Wicklow Town – Rathnew.

Our client welcomes the opportunity to provide a submission on the Draft LAP and looks forward to future engagement with the Planning Authority throughout the plan making process.

This submission formally requests that the Planning Authority:

1. **Review their housing yield allocations for Wicklow Town - Rathnew and ensure that their analysis is accurate and evidence based in accordance with the latest population growth and housing yield projections of the RSES, NPF and ESRI.**
2. **Zone sufficient lands to deliver on housing projection forecasts for Wicklow Town and Rathnew.**
3. **Allocate our clients lands an appropriate residential zoning that can deliver residential units within the lifetime of the LAP.**

This submission reviews population growth forecasts and housing requirements for Wicklow Town-Rathnew and assesses the proposed residential zoned lands under the Draft LAP and their projected yield to accommodate the forecasted growth of the town over the lifetime of the LAP.

Furthermore, this submission sets out the suitability of the site at Mariner’s Point, Greenhill Road, Ballyguilemore, Wicklow Town for residential development, as a site that is ‘fully serviced’ and ‘immediately available’ for development in the short term.

Our client is eager to bring this site forward for development, evidenced by the live planning application on site (Reg. Ref. 23/914 refers) and in doing so, it is preferable for the site to have the benefit of an appropriate land use zoning that has the potential for residential development.

In this regard, we urge the Council to accept the merits of rezoning, a portion of the lands at Mariner’s Point, from ‘RN2 to ‘RN1’ in the forthcoming final LAP document for the Wicklow Town - Rathnew area.

We therefore invite the Planning Authority to amend the Draft LAP Zoning Map as follows:

**To illustrate the subject site at Mariner’s Point rezoned from zoning objective RN2 – New Residential Priority 2 to zoning objective RN1 – New Residential Priority 1.**

***Reason:*** *In the interest of proper planning and sustainable development of the area.*





## 2 Introduction

Our client welcomes the opportunity to provide a submission on the Draft Wicklow – Rathnew Local Area Plan 2025, and we trust that our input will be considered prior to the adoption of the final Local Area Plan.

### 2.1 Client Background

We refer to the following company statement prepared by Ardale Property.

*“Ardale is an established Irish development company. At our core, we are focused on crafting schemes into new communities to be proud of, with new homes and employment centres and supporting infrastructure such as cycleways, parks and playgrounds as well as childcare and nearby neighbourhood retail.*

*We use our expertise and knowledge to create a strategy around each landholding focused on delivering a masterplan that all stakeholders in a project from the Local Authority to the local community can get behind. Early-stage delivery of infrastructure such as new roads, retail, community, and sports facilities are a key component of our approach, which helps us bring new communities to life.*

*Ardale are hugely active in County Wicklow, with housing schemes such as Heatherside in Arklow (200 units), Tinakilly Park in Rathnew (365 units), Clermont Grove (45 units) and Mariners Point (74 units) fully underway. Other notable recent developments include the delivery of the new Retail Centre in Rathnew anchored by Aldi. Several schemes are also progressing to pre-planning or planning stage with the Council including the Newcastle lands. These other schemes should bring forward over 500 new housing units across a number of superb high quality housing schemes, subject to planning.”*

### 2.2 Client's Landholding

This submission in respect of the Draft Wicklow Town – Rathnew LAP is made in so far as it relates to our client's land parcel at **Mariner's Point, Greenhill Road, Ballyguilemore, Wicklow.**

#### 2.2.1 Mariner's Point, Wicklow Town

Our client controls approx. 7.52 ha located to the south of Wicklow Town adjoining Mariner's Point development on Greenhill Road and comprise of partially brownfield lands of approx. 4.22 ha.

The northern portion of the site comprises of unfinished development with foundations poured in a number of dwellings from a previous expired permission. The north and northeastern portion of the site is bound by existing mature residential developments. The remainder of the site is bound by undeveloped, greenfield lands. The site sits approx. 4km from the M11 Motorway providing easy access to the M50 and the wider road networks.

As part of development Phase 1, the northern portion of the site now has the benefit of planning permission for 74 no. residential units (Reg. Ref. 22/504 refers) for which construction is significantly underway (as can be seen from Figure 1 below). Lands to the south form the second phase of development for 47 no. units (application Ref. 23/914 refers) and forms part of this submission. Our client's overall landholding is depicted in red in Figure 1 below.



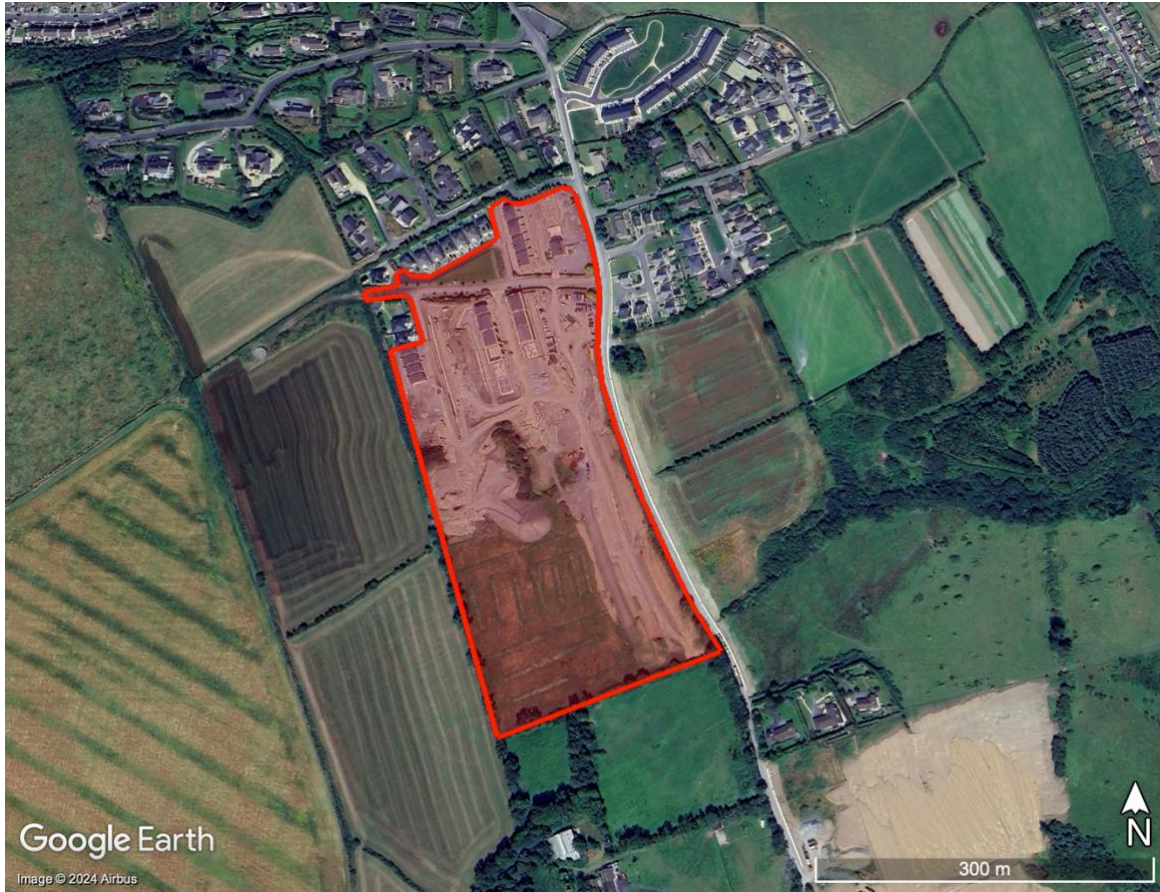


Figure 1 – Aerial View with landholding outlined in Red

The general site context is summarised as follows:

- The subject site forms part of a residential development permitted under Ref. 04/753, and revised and extended under Refs. 06/5921, 07/835, 09/380, 15/34 (EOD), 17/1542 and 22/504.
- The site is now considered a vacant and underutilised brownfield site, connected to the partially developed Mariner's Point residential development.
- The site is connected to Wicklow Town Centre by existing footpaths and roads (Ballyguilemore Road). The site has the benefit of access to a variety of existing amenities, educational and commercial facilities and services nearby.
- The site is not located on or near any protected structures, Architectural Conservation Areas or special areas of natural heritage.

This site serviced / serviceable via new connection to existing systems including water and wastewater infrastructure and permitted road infrastructures in place. The zoning which includes residential development provides an opportunity to consolidate existing development at this land parcels.

Having regard to the above, it is considered that the site can provide much needed residential accommodation proximate to the town/village centres.

It is our professional opinion that the subject sites' location in terms of accessibility to Wicklow Town Centre, proximity to existing transport nodes and local and employment areas makes it an ideal candidate to assist with the delivery of additional residential accommodation in accordance with the National Planning Policy Mandate, discussed further in Section 3 of this submission.

**We urge the Council to revisit this site and the potential it offers in the preparation of the final Local Area Plan and recognise its significance as a key site in the town's continued growth. It is submitted that its allocation for housing would represent a planned and cohesive approach to housing provision in the town.**

A rezoning proposal for these lands is set out in Section 5 of this submission.





### 3 Statutory Planning Context

Key policy and objectives from National, Regional and Local levels are outlined below as the planning context to this LAP submission. It is imperative that the Planning Authority takes direction from these policy documents so that the final LAP is robust and founded on a strong evidence base using latest available information.

#### 3.1 National Planning Framework – Project Ireland 2040

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of new development on infill and brownfield sites for housing and particularly those close to public transport corridors is key to enabling growth such as the site at Mariner's Point.

Section 2.6 of the NPF states the following in relating to compact and sustainable growth:

*"A preferred approach would be **compact development that focuses on reusing previously developed, 'brownfield' land, building up infill sites**, which may not have been built on before and either reusing or redeveloping existing sites and buildings.*

*An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference."*

The document goes on to state the following in relation to infill and brownfield development:

*"The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. **This is applicable to all scales of settlement, from the largest city, to the smallest village.**"*

**National Policy Objective 1b** – "Eastern and Midland Region: 490,000 - 540,000 additional people, i.e. a population of around 2.85 million."

**National Policy Objective 3a** – "Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."

**National Policy Objective 32** – "To target the delivery of 550,000 additional households to 2040."

**National Policy Objective 72a** – "Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan."

**National Policy Objective 72b** – "When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages."

The National Planning Framework signals a shift in Government policy towards **securing more compact and sustainable urban development, which requires at least half of new homes within Ireland's cities to be provided within the existing urban envelope.**

#### 3.1.1 Draft First Revision to the National Planning Framework, 2024

Following a decision of Government in June 2023, the preparation of a revised National Planning Framework commenced. This Draft Framework has been published in July 2024 and has revised and updated the NPF to take account of changes that have occurred since it was published in 2018 and to build on the framework that is in place.

The revised Framework sets out that in the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living the State, approximately 6.1 million by 2040. This will give rise to a need for approximately 50,000 additional households per annum to 2040. The revised NPF sets out that 75% of the growth is to be outside of Dublin and its suburbs. To align with principles of compact





growth, a greater proportion i.e. 40% of future housing development is to be within the existing 'footprint' of built-up areas.

The 2018 NPF planned for population growth of 1.1 million people, and a total population of 5.85 million by 2040. Census 2022 recorded a population of 5.15 million in Ireland, clearly far ahead of the 2018 projections. The ESRI has updated its national and regional population projections to account for Census 2022 and to take account of up to date economic, fertility, mortality and migration data. The updated projection is that the population of Ireland will increase to approximately 5.7 million by 2030 and to 6.1 million by 2040. Given the key role of international migration in shaping population growth in Ireland, the ESRI have also modelled a higher international migration scenario with a projected population of 6.3 million people by 2040 (baseline + 200,000).

The ESRI projections form the basis for the revised NPF. This means that the NPF will now need to plan for a population of **6.1 million by 2040, an additional 250,000 people over that planned for in 2018**. To account for the possibility of higher net in-migration over the period to 2040, an allowance is made in the NPF to enable ambition and flexibility in planning for future growth. In effect, the Framework needs to plan to accommodate around 950,000 additional people in Ireland between 2022 and 2040, while also making provision for a higher in-migration scenario.

Section 2.7 of the Draft Revised NPF sets out the following:

*“Planned growth at settlement level is to be reflected in the objectives of the statutory development plan, including land use zoning objectives, **subject to an appropriate and proportionate element of flexibility in line with statutory guidelines**, and will be required to have regard to matters such as appropriate densities to be applied, taking into account the particular circumstances and location.”*

The strategic location of counties Kildare, Meath and Wicklow, proximate to the Capital, has in part, resulted in significant development in a region characterised by the dominance of Dublin. The Mid-East has experienced high levels of population growth in recent decades, at more than twice the national growth rate. Census data indicates that this pattern is continuing with population growth in the Mid-East exceeding the national average rate in the 2016 to 2022 period.

There were 49 Towns with a population of at least 10,000 or more people (an increase of 8 or 16% since the 2016 Census), home to 18% of Ireland's population. Ireland's urban population is larger than ever before and more than half of the population, or nearly 2.7 million people, now live in cities or large towns of at least 10,000 people.

The relevant revised National Planning Objectives that are directly applicable to the subject site in the LAP context are noted as follows:

**Revised NPO 3** – *“Eastern and Midland Region: approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.”*

**Revised NPO 7** – *“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.”*

**Revised NPO 10** – *“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served*

**Revised NPO 43** – *“To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.”*

- As currently drafted, the LAP fails to plan for the required level of growth identified in the revised NPF. Additional residential zoning is required.

**Revised NPO 44** – *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

**Revised NPO 47** – *“Continue to develop methodologies and data sources to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will include standardised requirements for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation.”*







**Revised NPO 95** – “The Government will work to establish the necessary institutional and funding arrangements to support the development and accelerated delivery of Transport Orientated Development at suitable locations in conjunction with the ongoing programme of investment in the public transport network.”

**Revised NPO 96** – “Provision will be made for urban area plans and priority area plans, to replace current local area plan provisions; coordinated area plans to be prepared where a town and environs lie within the combined functional area of more than one local authority, and the designation of areas with significant potential for development as Candidate Urban Development Zones and Urban Development Zones in order to facilitate focused investment in enabling infrastructure and accelerated development.”

**Revised NPO 97** – “Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.”

**Revised NPO 98** – “When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.”

**Revised NPO 99** – “When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.”

We urge the Wicklow County Council to ensure that the forthcoming Local Area Plan not only supports the strategic growth objectives outlined in the Draft Revised NPF but also integrates these principles into actionable policies that promote sustainable development, enhance quality of life, and support economic vitality.

### 3.1.2 ESRI Population Projections and Housing Demand Publication, 2024

The Draft First Revision of the NPF has been revised based on the Economic & Social Research Institute (ESRI) publication of “Population Projections, The Flow of New Households and Structural Housing Demand,” published on 2<sup>nd</sup> July 2024. This report provides estimates of structural (demographic) housing demand at a regional level.

This report provides estimates of structural (demographic) housing demand at a regional level. Any assessment of structural future housing demand within this report relies on assumptions around population growth, headship rates (the typical household size) and rates of obsolescence of the housing stock. Each of these key drivers of structural housing demand is subject to uncertainty, and therefore a range of alternative assumptions for each key driver is considered and results from a range of scenarios.

From the outset, the report notes that Ireland has experienced rapid population growth in recent years, both compared to historical experience and relative to other EU countries. Population growth in Ireland was the third highest in the EU (after Luxembourg and Malta). Over the 20-year period 2001 to 2021, the population in Ireland grew by 30.3 per cent compared to population growth of just 4.1 per cent in the EU27 (as a block).

Census 2022 data reveals that the population was 5.184 million, having increased by 422,000 or by 9% since 2016. The report highlights that this recent data means that **many previous population scenarios for Ireland have underestimated population growth over the short term**. Net migration is the key driver of population change in Ireland and net migration flows have been very strong in recent years.

As in the past, while all regions experienced population growth, the growth has not been evenly dispersed throughout the country.

At a national level, the population grew at an annual average growth of 1.4% between 2016 and 2022; the **Eastern and Midlands region experienced the strongest growth of 1.6% (driven especially by growth in the Mid-East)**. The faster growth in the Eastern and Midlands region means that it is capturing a higher share of the population over time. While the region had 47% of the population in 1996, the share has been trending slowly upwards so that by 2022 the region had 49.3% of the population.





At a national level, in the baseline population scenario, the population is expected to increase by 922,000 between 2022 and 2040, resulting in a total population of over 6.106 million people by the end of the period. This implies significant overall population growth of 1.0% on an annual average basis, which is high relative to other countries. Given the key role of international migration in shaping population growth in Ireland, a range of alternative scenarios are considered in the report where migration is higher and lower than in the baseline scenario. While this provides a range for alternative international migration scenarios, any unanticipated major structural changes may require the projections to be revised. In the high (low) international migration scenario, the population grows by 1.2% (0.8%) on an annual average basis over the period and reaches 6.308 (5.904) million by 2040. By 2040, the difference in the population between the high and low international migration scenarios is just over 400,000, showing how sensitive the overall population projections are to different assumptions around net international migration. The figure below shows these scenarios compared to the NPF projections.

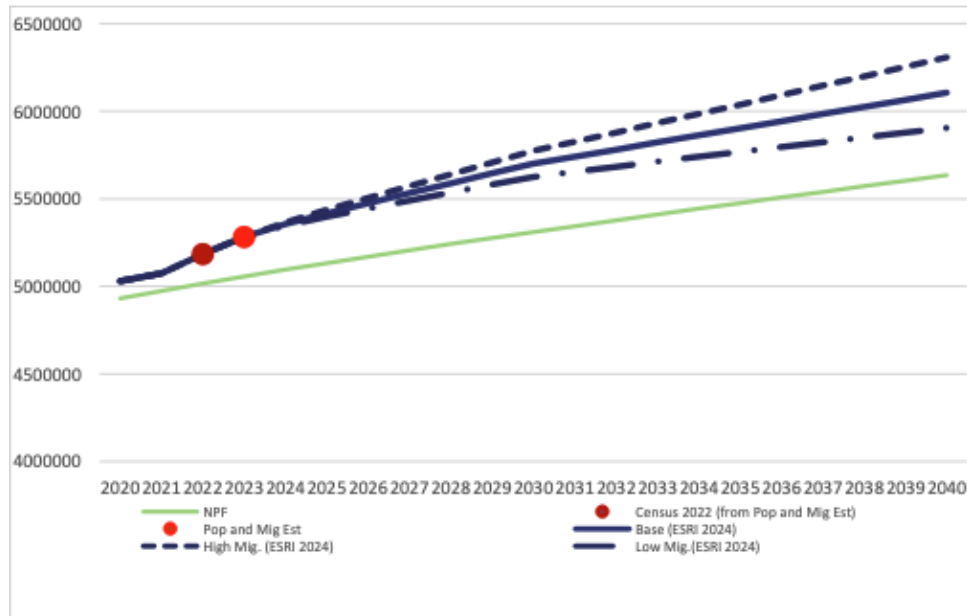


Figure 2 – Total Population Across Different Scenarios (Source: ESRI, 2024)

At a regional level, while all regions are expected to experience population growth over the projection horizon, the Eastern and Midlands region is expected to experience relatively higher growth, concentrated in the Dublin and Mid-East regions, while the Northern and Western and Southern regions are expected to experience relatively lower population growth. On an average annual basis, the population in the Mid-East region is expected to increase by 1.1% up to 2040.

	Population ('000s)			Annual Average Growth		
	2022	2030	2040	2022–2030	2030–2040	2022–2040
<b>State</b>	<b>5184.0</b>	<b>5699.9</b>	<b>6106.1</b>	<b>1.3%</b>	<b>0.7%</b>	<b>1.0%</b>
<b>Eastern and Midlands</b>	<b>2557.5</b>	<b>2856.8</b>	<b>3098.2</b>	<b>1.5%</b>	<b>0.8%</b>	<b>1.1%</b>
<b>Dublin</b>	<b>1468.0</b>	<b>1664.2</b>	<b>1814.6</b>	<b>1.6%</b>	<b>0.9%</b>	<b>1.2%</b>
<b>Mid-East</b>	<b>769.3</b>	<b>848.3</b>	<b>922.4</b>	<b>1.4%</b>	<b>0.9%</b>	<b>1.1%</b>

Figure 3 – Population Projections – Baseline Scenario (Source: ESRI, 2024)

Transforming population projections into the number of future households requires assumptions on headship (the typical household size). It is important to state the report presents a range of scenarios for future structural housing demand based on a set of assumptions. Across all scenarios, assumptions are driven by data and international trends, and the research evidence base.



Based on the three demographic scenarios (baseline, high international migration and low international migration), as well as a range of assumptions on headship rates (based on current trends and a fall in household size) and obsolescence rates (0.25 per cent and 0.5 per cent), 12 main structural housing demand scenarios are considered.

Taking the average over all 12 scenarios, structural housing demand is projected to be around 44,000 per annum (p.a.) from 2023–2030, and around 39,700 p.a. over the 2030–2040 period. In the baseline population scenario, estimated structural housing demand in the period 2023–2030 ranges from around 38,000 p.a. (assuming current trends in headship and a 0.25 per cent obsolescence rate) to 50,000 p.a. (assuming household size falls and a 0.5 per cent obsolescence rate). In the high (low) international migration population scenario, estimated structural housing demand for the same 2023–2030 period ranges from around 40,700 (35,000) p.a., assuming current trends in headship rates and a 0.25 per cent obsolescence rate, to 53,000 (47,000) p.a., assuming a fall in household size/increase in headship and a 0.5 per cent obsolescence rate.

Further, Appendix 1 of the report sets out local authority level population and housing demand projections as follows:

	Population ('000) Baseline				Annual Growth in %, 2022–2040		
	2022	2027	2032	2040	Baseline	High Migration	Low Migration
<b>State</b>	<b>5184.0</b>	<b>5532.1</b>	<b>5781.0</b>	<b>6106.1</b>	<b>1.0%</b>	<b>1.2%</b>	<b>0.8%</b>
<b>Carlow</b>	62.4	65.2	66.7	68.8	0.6%	0.7%	0.5%
<b>Cavan</b>	82.3	86.5	88.8	91.4	0.7%	0.8%	0.5%
<b>Clare</b>	128.8	136.4	141.6	149.1	0.9%	1.0%	0.7%
<b>Cork</b>	588.1	626.4	653.6	690.3	1.0%	1.1%	0.8%
<b>Donegal</b>	168.2	177.0	181.9	188.1	0.7%	0.8%	0.5%
<b>Dublin</b>	1468.0	1596.3	1696.9	1814.6	1.2%	1.5%	1.0%
<b>Galway</b>	279.6	297.9	311.8	331.5	1.0%	1.2%	0.9%
<b>Kerry</b>	157.5	167.2	173.8	183.3	0.9%	1.1%	0.7%
<b>Kildare</b>	249.4	270.3	288.2	315.1	1.4%	1.5%	1.2%
<b>Kilkenny</b>	104.9	109.4	111.9	115.4	0.6%	0.7%	0.5%
<b>Laois</b>	92.5	98.0	101.6	106.9	0.9%	1.0%	0.7%
<b>Leitrim</b>	35.4	37.6	39.2	41.5	1.0%	1.1%	0.8%
<b>Limerick</b>	211.0	224.2	233.3	244.9	0.9%	1.1%	0.7%
<b>Longford</b>	47.1	49.3	50.4	51.7	0.7%	0.8%	0.5%
<b>Louth</b>	140.6	147.9	152.1	157.5	0.7%	0.9%	0.6%
<b>Mayo</b>	138.9	143.7	144.7	145.2	0.3%	0.5%	0.2%
<b>Meath</b>	222.3	237.5	249.1	266.9	1.1%	1.3%	1.0%
<b>Monaghan</b>	65.7	68.6	69.8	70.8	0.5%	0.7%	0.3%
<b>Offaly</b>	83.7	88.7	92.3	97.6	0.9%	1.1%	0.8%
<b>Roscommon</b>	70.7	74.7	77.4	81.5	0.9%	1.0%	0.7%
<b>Sligo</b>	70.7	75.6	79.3	85.0	1.1%	1.2%	0.9%
<b>Tipperary</b>	169.0	178.1	183.5	190.6	0.7%	0.9%	0.5%
<b>Waterford</b>	128.2	134.5	138.4	144.1	0.7%	0.8%	0.6%
<b>Westmeath</b>	96.9	101.2	103.1	105.0	0.5%	0.7%	0.4%
<b>Wexford</b>	165.0	173.5	178.7	186.3	0.8%	0.9%	0.7%
<b>Wicklow</b>	156.9	166.3	172.9	182.9	0.9%	1.1%	0.8%

Figure 4 – Population Projections – Local Authority Level (Source: ESRI, 2024)





	Average Across All Assumptions		Lowest		Highest	
	2023–2030	2030–2040	2023–2030	2030–2040	2023–2030	2030–2040
			low migr, current trend headship & 0.25% obs.		high migr, lower hh size headship & 0.5% obs.	
<b>State</b>	<b>44,047</b>	<b>39,654</b>	<b>35,018</b>	<b>27,805</b>	<b>53,294</b>	<b>52,445</b>
<b>Carlow</b>	432	364	343	252	523	484
<b>Cavan</b>	566	502	436	335	700	681
<b>Clare</b>	973	884	770	608	1,180	1,182
<b>Cork City</b>	1,651	1,501	920	1,064	1,386	1,971
<b>Cork County</b>	3,352	3,046	3,081	2,160	4,641	4,001
<b>Dublin – Dublin City</b>	6,526	5,444	5,054	3,656	8,042	7,403
<b>Dublin – DL-Rathdown</b>	2,643	2,435	2,178	1,826	3,121	3,096
<b>Dublin – Fingal</b>	3,211	2,724	2,558	1,844	3,882	3,683
<b>Donegal</b>	1,187	1,079	915	713	1,464	1,474
<b>Dublin – South Dublin</b>	3,033	2,697	2,452	1,918	3,630	3,545
<b>Galway City</b>	794	653	611	421	982	903
<b>Galway County</b>	1,600	1,511	1,320	1,122	1,885	1,928
<b>Kerry</b>	1,193	1,064	944	724	1,448	1,429
<b>Kildare</b>	2,371	2,428	1,971	1,867	2,779	3,028
<b>Kilkenny</b>	675	642	537	460	816	836
<b>Laois</b>	718	709	577	527	862	906
<b>Leitrim</b>	262	256	204	176	322	343
<b>Limerick</b>	1,769	1,484	1,405	1,011	2,142	1,994
<b>Longford</b>	311	261	243	177	381	351
<b>Louth</b>	1,054	953	832	665	1,280	1,262
<b>Mayo</b>	724	542	517	284	935	821
<b>Meath</b>	1,801	1,877	1,468	1,420	2,141	2,368
<b>Monaghan</b>	434	374	333	245	537	514
<b>Offaly</b>	630	609	506	440	757	790
<b>Roscommon</b>	488	479	381	331	598	637
<b>Sligo</b>	627	576	501	401	755	764
<b>Tipperary</b>	1,187	1,048	914	687	1,466	1,438
<b>Waterford</b>	939	836	750	588	1,131	1,098
<b>Westmeath</b>	643	522	494	340	795	717
<b>Wexford</b>	1,113	1,023	891	730	1,339	1,333
<b>Wicklow</b>	1,141	1,129	912	816	1,374	1,465

Figure 5 – Structural Housing Demand Projections by Local Authority (Source: ESRI, 2024)

We request Wicklow County Council to take into consideration this report and amend population and housing demand projections in the formulation of the forthcoming draft LAP to align with the ESRI’s projected population figures.

### 3.1.3 Department of Housing, Local Government & Heritage (DHLGH) Press Release, November 2024

On 5<sup>th</sup> November 2024, the DHLGH published a press release wherein the government has agreed to progress amendments to Draft Revision of National Planning Framework and ambitious new housing targets.

The Government has approved revised new housing targets for the period 2025 to 2030, aiming to deliver a total of 303,000 new homes across Ireland. This plan sets an **average of 50,500 homes per year – scaling up to 60,000 homes in 2030 and that level maintained thereafter**. This milestone decision





represents a critical step towards meeting Ireland's growing housing needs, driven by projected population increases, latent and ongoing demand for housing.

These revised housing targets reflect the latest research and modelling by the ESRI, which forecasts substantial population growth over the next decade. The approved targets aim to ensure that housing supply meets both new demand and addressing existing need, creating a sustainable future for housing in Ireland.

In addition, we highlight the Minister for Housing, Local Government and Heritage, Darragh O'Brien's emphasis:

*"The targets set will only ever be the floor, not the ceiling, and as has been proved over the two full years of the Housing for All plan, where we can surpass our targets, we will."*

It is essential that Wicklow County Council takes immediate, proactive steps to allocate sufficient residentially zoned land within the Wicklow Town - Rathnew Local Area Plan. We strongly urge Wicklow County Council to adopt the Wicklow Town - Rathnew Local Area Plan, recognising the urgent need to align local planning with the ambitious new national housing targets set forth by the Government. The revised targets require proactive local action to provide sufficient zoned residential land to accommodate projected housing demand and to support Wicklow's growth sustainably.

### 3.2 Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)

The Regional Spatial and Economic Strategy (RSES) published by the Eastern and Midland Regional Authority provides a long-term strategic planning and economic framework designed to support the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures, and constraints, establishing a framework for investment to effectively manage spatial planning and economic development throughout the Eastern and Midland Region. The RSES is pivotal in developing planning policies that address future housing needs, taking into account the availability of land, resources, environmental considerations, and infrastructure capacity.

Wicklow Town-Rathnew is identified as a Key Town within the Core Region which are defined as *"large towns which are economically active towns that provide employment for their surrounding areas. They have high-quality transport links and the capacity to act as regional drivers to complement the Regional Growth Centres."*

The RSES states that Core Region Key Towns *"have capacity and future growth potential to accommodate above average growth coupled with requisite investment in employment creation, services, amenities and sustainable transport."*

A noted growth enabler for the settlements in the Core Region includes *"Commensurate population and employment growth in Key Towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements."*

Wicklow-Rathnew Town itself is described as:

*"Wicklow-Rathnew includes both the County Town of Wicklow and the town of Rathnew, with a combined population of c. 14,000 people in 2016, and is a key settlement within the Core Region. It has a strategically important location of M/N11 and rail corridor, and at the centre point of the coastal area of the County. Wicklow has an important position as the County Town, providing higher order services and facilities for the residents and its catchment. Rathnew has a distinct identity and functions as a local service centre for its local community. Key priorities are to strengthen the local employment base, improve sustainable transport and promote compact growth with a focus on regeneration, development of the port and harbour area, and to expand Wicklow-Rathnew's role as a hub for tourism, training and education."*

The Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES) contains a specific objective (RPO 4.3) which sets out the following in relation to **Consolidating and Re-Intensification:**





*“RPO 4.3: Support **the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs** and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

Having reviewed the key policies of the recently adopted RSES document, we are of the view that subject site at Mariner's Point constitutes a brownfield site and that residential use could be achieved on the site in accordance with the spirit and intent of RSES in order to ensure the optimal sustainable long terms use of the site which is:

- An Underutilised infill site within the metropolitan area of Dublin in close proximity to high frequency public transport services.

### **Population Projections**

Specific regional and county population projections to 2026 and 2031 are provided for each region in the “Implementation Roadmap for the National Planning Framework”, which sets a growth trajectory for each area to be applied in the core strategies of all subsequent Development Plans and associated variations.

The overarching objective is to manage an adequate supply of land to 2026 and beyond that to 2031. The Regional Spatial and Economic Strategy for the Eastern and Midland Region specifically states the following:

*“... the zoning of land and planning permission alone, do not necessarily guarantee delivery and population growth in accordance with projected, targeted timeframes. Therefore, in planning for future growth, it will be important for planning authorities to set out and monitor the service capacity and likely rate of completion of development on zoned lands, both brownfield and greenfield as well as elsewhere, having regard to local conditions and trends.”*

In this respect, we note that population projections and associated zoned land supply are often considered to be maximum numbers to be allowed through the planning system rather than being a minimum effective supply to maintain sustainable levels of growth. Should housing allocation figures be taken as a maximum by Local Authorities, housing supply could be severely constrained, as longstanding market barriers and on-site constraints are often not adequately considered in the conversion rates of permitted housing to completed and occupied units.

In a review of the annual returns by the Dublin Housing Task Force (Department of Housing, Planning and Local Government) over the last 4 years, recent trends suggest that the average estimated conversion rate for residential units permitted, is in the region of 25%. Therefore, in order to deliver the number of completed and occupied units required in a given area, approximately three times as many units will need to be permitted to ensure adequate delivery of housing supply. By extension, this has obvious connections with the provision of zoned land to ensure adequate availability of residential sites.

### **3.3 Wicklow County Development Plan 2022-2028**

Wicklow is recognised as the County town, providing important administrative and local government functions. The town is strategically located on the M/N11 and south-eastern rail corridor, at the centre point of the coastal area of the County. It is an economically active town that provides higher order services and facilities for the residents of the town and its catchment. Within the settlement, Rathnew has a distinct identity and functions as a local service centre for its local community.

Wicklow Town-Rathnew is considered a Level 2 Key Town in the Core Region with large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.





## Core Strategy

It is estimated that Wicklow-Rathnew region will yield 52% of the total projected population increase in the County to 2031.

A minimum of 30% of the targeted housing growth shall be directed into the built up area of the settlement. In order to ensure however that overall housing and population targets are not exceeded to any significant degree, the amount of land zoned for the housing development outside of the built up envelope of any existing settlement shall not exceed 70% of the total housing target for that settlement.

As a ‘Core Region Key Town’, the settlement should provide housing for people from across the County and region.

**Table 3.5 Wicklow Settlement / Aggregate Settlement Housing Targets to Q2 2028 and Q4 2031**

Level	Settlement	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
1	Bray	11,232	165	100	4,026	771	5,062
2	Wicklow -Rathnew	5,456	650	200	1,267	275	2,392
3	Arklow	5,406	165	100	790	166	1,221
	Greystones - Delgany	6,766	875	400	508	170	1,953
4	Blessington	1,914	5	40	393	81	519
	Baltinglass	903	46	40	85	24	195
	Enniskerry	648	34	40	36	15	125
	Kilcoole	1,451	97	20	140	30	287
	Newtownmountkennedy	1,222	250	100	433	99	882
	Rathdrum	669	132	100	68	31	331
5	Ashford	2,390	255	90	129	41	515
	Aughrim						
	Carnew						
	Dunlavin						
6	Tinahely	1,534	46	30	114	28	218
	Avoca						
	Donard						
	Kilmacanogue						
	Newcastle						
Roundwood							
Shillelagh							
7-9 10	Villages / clusters Open countryside	15,395	510	134	478	117	1,249
	<b>Total</b>	<b>54,986</b>	<b>3,230</b>	<b>1,404</b>	<b>8,467</b>	<b>1,848</b>	<b>14,949</b>

**Table 3.6 Housing development completed, underway and permitted in Co. Wicklow**

Level	Settlement	Housing Units completed post 2016	Units under construction <sup>5</sup>	Extant permission <sup>6</sup>
1	Bray	165	409	876
2	Wicklow - Rathnew	650	376	481
3	Arklow	165	181	109
	Greystones - Delgany	875	1050	688
4	Blessington	5	45	307
	Baltinglass	46	50	69
	Enniskerry	34	69	88
	Kilcoole	97	23	17
	Newtownmountkennedy	250	587	11
	Rathdrum	132	137	173
5	Ashford	255	101	225
	Aughrim			
	Carnew			
	Dunlavin			
6	Tinahely	46	30	109
	Avoca			
	Donard			
	Kilmacanogue			
	Newcastle			
Roundwood				
Shillelagh				





### Infrastructure

As illustrated in Figure 3 below, Wicklow-Rathnew is serviced by adequate water, wastewater and road infrastructure. Wicklow-Rathnew is considered a Tier 1 zoned area.

Town Village /	Plan Name	Infrastructure			Zoning Tier
		Waste water	Water	Transport (Roads, lighting footpaths etc)	
Wicklow Rathnew	Wicklow & Rathnew Town Development Plan (to be replaced post CDP adopted with LKAP)	Serviced by the Wicklow Wastewater Treatment Plant currently operating below design capacity (34,000pe, operating at c. 19,000pe) and has capacity to accommodate the growth targeted by the Core Strategy (including Ashford).	Supplied with potable water from the Vartry water supply and is well within operational capacity.  Upgrade to increase capacity is due for completion in 2021	Local level supporting infrastructure to be provided in accordance with the implementation of relevant local planning permissions and the Council’s capital investment programme.	Tier 1

Figure 5 – CDP Appendix 9 Infrastructure and Zoning Bands

### Phasing

We refer to the following extract from Section 6.3.4 of the County Development Plan with regards to the phasing of development:

*“The development of zoned / designated land should generally be phased in accordance with the sequential approach:*

- Development should **extend outwards from the primary area with undeveloped land closest to the core and public transport routes** being given preference, i.e. ‘leapfrogging’ to peripheral areas shall be resisted;
- A strong emphasis should be placed on **encouraging infill opportunities and better use of under-utilised lands** and;
- **Areas to be developed should be contiguous to existing developed areas.**

*Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.”*

The Plan describes the sequential approach as follows:

#### Principle 4: Sequential approach

The priority locations for new residential development will be:

- Priority 1 In the designated ‘town’ and ‘village’ / ‘neighbourhood centres’ or ‘primary zone’ through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.
- Priority 2 Strategic Sites as identified by the RSES and associated MASP
- Priority 3 Infill within the existing built envelope of the town, as defined by the CSO Town boundary
- Priority 4 Where a need for ‘greenfield’ residential development is identified, the ‘two-tier approach’ to land zoning as set out in the NPF will be taken i.e.

**Tier 1 Serviced Zoned Land** is described in the Draft Plan as follows:

- This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and



water supply, for which there is service capacity available, and can therefore accommodate new development.

- These lands will generally be positioned within the existing built-up footprint of a settlement or **contiguous to existing developed lands**. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.
- Inclusion in Tier 1 will generally require the lands to within the footprint of or spatially sequential within the identified settlement.

We conclude that there are no barriers to residential development at the lands at Mariner’s Point, Wicklow Town. The lands have the benefit of previously permitted and extant permissions and represents partially completed development. Construction significantly underway for 74 no. residential units granted under Reg. Ref. 22/504 as part of Phase 1 of development. The remainder of the site as part of Phase 2 is serviced or serviceable via new connection to existing systems with existing and permitted road infrastructure in place and capable of providing further residential units.

### 3.4 Wicklow Town – Rathnew Development Plan 2013-2019

#### 3.4.1 Zoning

##### Mariner’s Point

Under the current Wicklow Town-Rathnew Development Plan 2013-2019, the subject site has two residential land-use zonings. The northern portion of the site is zoned ‘RE – Residential – Infill:’ with an objective to ‘protect and preserve existing residential uses and provide for infill residential development’ while the southern portion of the site is zoned ‘R4 – Residential’ with an objective to ‘to provide for new residential development at densities up to 10 units per hectare.’

Both site zonings above permit the following uses in principle:

*“new dwellings, education, home based commercial activities, religious building, creche or nursery school, community facility, open space, playground, residential institution, skate park.”*

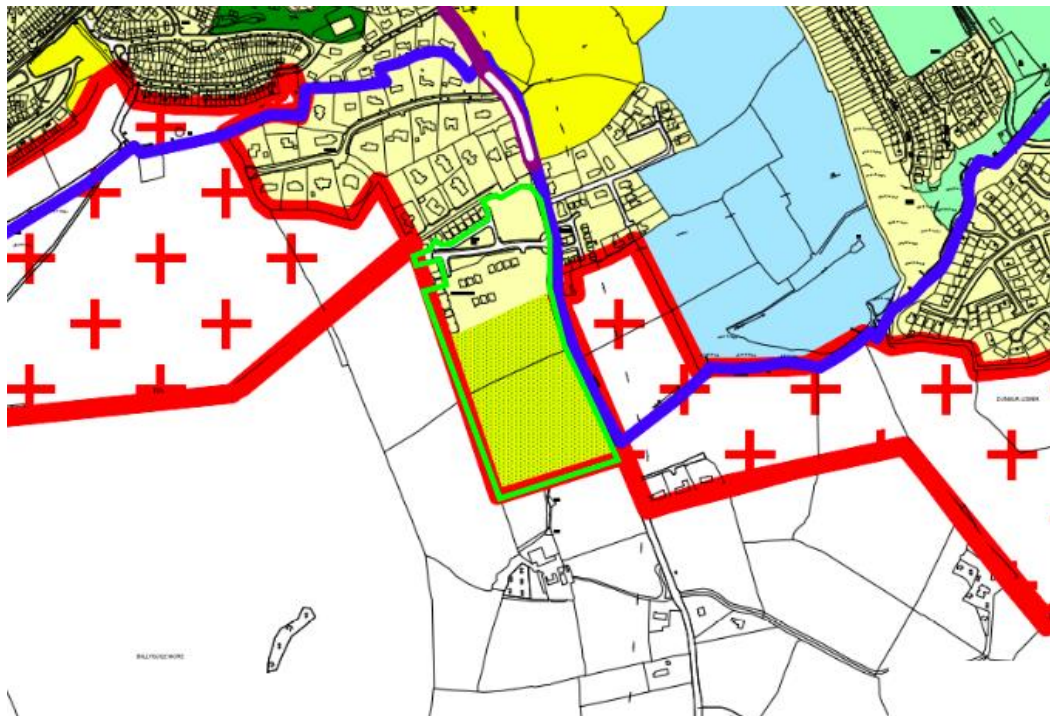


Figure 6 – Wicklow Town – Rathnew Development Plan 2013-2019 Zoning (site outlined in Green).



### 3.5 Key Summary of the National Policy Mandate

The National Planning Framework signals a shift in Government policy towards **securing more compact and sustainable urban development, which requires at least half of new homes within Ireland's cities to be provided within the existing urban envelope.**

National policy further supports and reinforces **the need for urban infill residential development in close proximity to quality transport routes and within existing urban areas.**

The Mariner's Point site is considered underutilised and constitutes a brownfield site in planning terms. The site is located on a well-established residential zoned site within the settlement boundary surrounded by existing and future residential developments.

More specifically, the delivery of uses such as residential on this prime, infill/brownfield, underutilised site, in our considered view would be consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.

It is submitted that the Wicklow Town – Rathnew LAP has the opportunity to identify a range of key sites that will address the housing needs of the town in terms of locations for development and quantities of units required, all in line with principles of good placemaking. **It is imperative that any lands zoned for residential development are readily available, serviced and located in close proximity to the town centre and this is now a critical consideration for Wicklow County Council.**

The provisions of national, regional and local planning policies and guidelines are welcomed and should be given due consideration by the Planning Authority in the preparation of the final Wicklow Town – Rathnew Local Area Plan 2025-2031.





## 4 Key Issues to be Addressed

### 4.1 Population and Housing

The Draft Wicklow Town – Rathnew Local Area Plan sets out the population and housing targets for the settlement in accordance with the 2022 County Development Plan as follows:

Wicklow Town – Rathnew	2016 Census	2022 Census	Q2 2028 Target	2031 Target
Population	13,954	16,439	18,515	19,400
Housing	5,456	6,231	7,573	7,850

Table 1 – Population / Housing Growth Targets Wicklow – Town Rathnew as per Draft LAP

The table above sets out that from the recorded Census 2022, the projected population growth is 2,961 people and 1,619 houses to the end of the lifetime of the LAP.

It is important to note that these projections were initially derived from the 2016 Census, which informed the Wicklow County Development Plan 2022-2028, setting growth targets for population and housing needs up to 2031.

Whilst it is acknowledged that population statistics constantly evolve, a review of the Draft LAP has identified that there are conflicting sets of data and forecasts (Population and Housing) for Ballina town. We note specifically that the data contained in the County Development Plan Core Strategy; the County Housing Strategy; and the Draft LAP Core Strategy do not consider recently published Census 2022 data, which in turn impacts the calculations of the estimated housing yield for the lifetime of the Draft LAP.

Whilst we appreciate that the Draft LAP must be cognisant of the Core Strategy of the Development Plan, the plan making process provides for an opportunity to address this matter and the Planning Authority is required to set out clear and evidence – based analysis which accurately identifies a correct housing yield requirement for the settlement.

Given the availability of updated data from Census 2022, we strongly urge Wicklow County Council to reevaluate the Draft LAP’s methodology for projecting population and housing growth. An accurate approach would incorporate the most recent Census 2022 figures and reflect the updated national growth targets. This adjustment would ensure that the LAP is aligned with current population trends and housing needs, helping to support sustainable and responsive planning in the settlement.

Section 2.4 of the Draft LAP states that it will ensure:

*“adequate zoned land and supporting objectives to allow for the housing targets, as set out in the County Development Plan prevailing at the time of the adoption of this LAP, to be met.*

*The lands that are needed to be zoned to meet the current target will be zoned ‘New Residential’ and identified in this plan as ‘New Residential Priority 1’ lands.*

*In order to ensure an adequate future supply of housing lands, should the need arise for their development having regard to any changes to housing targets that might arise during the lifetime of this LAP, additional lands shall be zoned – ‘New Residential’ and identified as ‘New Residential Priority 2’ which shall only be considered for consent where it can be shown that such development would accord with the Core Strategy targets after the activation of Priority 1 lands.”*

It is our professional planning opinion that this approach is overly restrictive for promoting residential development. The requirement to exhaust Priority 1 lands before Priority 2 lands can be considered may significantly hinder the timely delivery of housing, as certain Priority 1 sites might face development constraints, such as ownership complexities, infrastructure requirements, or other site-specific challenges. Consequently, this restriction on Priority 2 lands could prevent critical residential areas from being developed within the LAP’s timeframe, potentially leading to a shortfall in meeting housing growth targets.





To support a more flexible and responsive planning framework, we recommend that Wicklow County Council reconsider this phased approach to land zoning, allowing for a more adaptable release of Priority 2 lands to ensure that residential development keeps pace with demand throughout the lifetime of the Plan.

We refer the Planning Authority to the Development Plan Guidelines for Planning Authorities, 2022, wherein Section 4.4.1 states the following:

*“It is a policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning.*

*Should it be the case that there is a surplus of well-located zoned and fully serviced land to meet population and housing supply targets already zoned for development in any local authority area when reviewing a development plan, it is recommended best practice that a phased approach be taken to prioritise the preferred sequence of development of such sites. However, **phasing should be applied where there is a sound planning rationale for doing so**, based on factors such as site location, the availability or proximity of, or capacity to provide, off-site services, facilities or infrastructure. This should also be viewed in the context of the urgent need to increase housing supply.*

*Phasing may not be necessary where the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the plan-making stage. In all cases, whether phasing is applied or not, **development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.***

*It is also best practice that in cases where land is zoned and has remained undeveloped and unserviced through one or more development plan cycles, with no prospect of being serviced within the six-year life of the development plan that is under preparation, alternative approaches must be considered:- (i) alternative zoning objectives or (ii) discontinuing the objective.”*

Further, Section 4.4.3 states the following:

*In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.*

**We are in a period of crisis in terms of housing delivery nationally and the conservative approach to zoning allocations and phasing of suitable sites for development by Wicklow County Council is a fundamentally inappropriate approach to plan making.**

## 4.2 Residential Zoning

Chapter 3 of the Draft Plan focuses on residential development. It aims to focus new residential development into the existing built envelope of the settlement on ‘Town Centre’, ‘Village Centre’, ‘Mixed Use’ and ‘Existing Residential’ zoned sites. This is supportive of compact growth principles however, we would note that a minimum of 30% of the targeted housing growth shall be directed into the built up area of the settlement. In order to ensure however that overall housing and population targets are not exceeded to any significant degree, the amount of land zoned for the housing development outside of the built up envelope of any existing settlement shall not exceed 70% of the total housing target for that settlement. Using this guideline, approximately 486 of the projected 1,619 residential units required by 2031 would need to be developed within the existing built-up area. The remaining 1,133 units, which must adhere to the 70% limit, would be allocated for development in peripheral or greenfield areas around the settlement.

The final LAP must deliver on the potential to realise opportunities available to the town to cater for families and social and affordable housing. Families generally seek to secure housing where there are





locational advantages that offer open space, a back garden and general sense of place. Town Centre sites are not appropriate for this offering and the market needs to ensure that appropriate locations within close proximity of the town are selected and brought forward. For these areas outside the built-up area, the Draft Plan has identified the following:

*‘Edge of centre’ locations will be considered the priority location for such new greenfield residential development and will generally be zoned as ‘New Residential – Priority 1’ (zoned RN1) while more ‘out of centre’ housing sites (zoned ‘New Residential – Priority 2’ RN2) will only be considered where Objective WTR4 is satisfied and on the basis of integrated housing / community facilities / open space schemes that can be well connected to the existing built up area. In order to be cognisant of extant permissions and/or the key role that some sites will play in the delivery of essential infrastructure, it may be necessary for some ‘out-of-centre’ sites to remain as Priority 1. Such areas may have a ‘Specific Local Objective’ (SLO) designation which are areas to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the lands having regard to the objectives specified in this plan.’*

To this end, we highlight that the planning authority has not provided a clear, evidence-based rationale for the specific zoning designations assigned to each site within the Draft LAP. Best planning practices dictate that zoning decisions, especially those that will have a significant impact on housing delivery, should be informed by a thorough, data-driven Settlement Capacity Audit. This type of audit would assess the capacity of each site to support sustainable development, taking into account factors such as infrastructure readiness, accessibility, environmental constraints, and proximity to essential services.

Without this evidence-based approach, the zoning allocations appear arbitrary and lack the transparency necessary for stakeholders to understand why certain lands were designated as Priority 1 while others were deferred to Priority 2. This lack of justification raises concerns that certain viable sites may remain undeveloped simply because they were not prioritised, which could inhibit the timely delivery of housing and undermine the LAP’s overall objectives.

We remind the Planning Authority of the Office of the Planning Regulator’s submission made at pre-draft stage which outlined specific recommendations in terms of consistency with the relevant legislative requirements for the preparation of the Draft LAP and we specifically note:

*“The Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines) provide clear guidance in terms of ensuring that sufficient housing lands/sites are provided based on the housing unit yield of land zoned for residential and a mix of residential and other uses. This is critical in terms of the ability to plan for the timely delivery of physical and social infrastructure in the right location to serve new housing development and to support compact and sequential growth.*

*The planning authority will also need to ensure consistency with the provisions of the tiered approach to zoning under NPO 72 a-c of the NPF. In this regard, the LAP should include an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with **section 4.5.2 – Settlement Capacity Audit of the Development Plans Guidelines.***

*It will be of critical importance to the implementation of the LAP to ensure that all lands zoned for residential and other development are serviced, or will be serviceable, during the plan period.”*

There are clear requirements for the preparation of a Settlement Capacity Audit under the Section 28 Ministerial Guidelines ‘Development Plans – Guidelines for Planning Authorities’.

We note specifically that section 3.2.2. of the Development Plan Guidelines for Planning Authorities sets out that “A Settlement Capacity Audit should also be undertaken to identify zoned services/serviceable lands with residential development potential”. Furthermore, Section 4.5.2 of the Guidelines outlined that a Settlement Capacity Audit “distinguishes between lands that are ‘Serviced’ (Tier 1) and those that are ‘Serviceable’ (Tier 2). This is to ensure that **an informed decision can be made as to whether or not to zone land or sites in particular settlement for residential development....**” The Guidelines importantly go on to state the following in Appendix A:

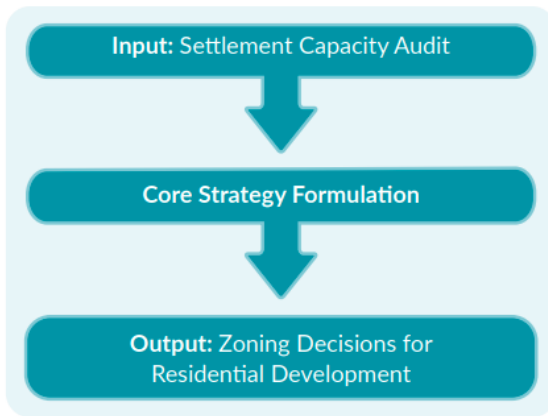
*“A Settlement Capacity Audit is now a key research task of the development plan preparation process to be undertaken by a planning authority. The work should seek to identify and map zoned residential (and mixed-use zoned) lands with residential development potential. This will include*





(i) lands within the existing built up area (ii) serviced greenfield ‘Tier 1’ tranches of land and (iii) serviceable greenfield ‘Tier 2’ lands.”

The zoning of lands subject of the LAP has not been carried out in accordance with a comprehensive and supporting Settlement Capacity Audit.



At the most basic site level, this infrastructural assessment must include the following infrastructure categories:

- Road access\*
- Footpath access\*
- Cycle access\*
- Foul sewerage drainage\*\*
- Water supply\*\*
- Surface water drainage\*\*

\* Including public lighting provision  
 \*\* In terms of capacity at a settlement level and access of sites to the network

In our professional planning opinion, a **Settlement Capacity Audit** is an essential, evidence-based foundation for zoning decisions, ensuring that each site’s development potential was objectively evaluated. We therefore strongly urge the Planning Authority to revisit the zoning designations using an evidence-based methodology, providing clear justification for the prioritisation of each residential zoned site (RN1 and RN2). This will ensure that the final LAP is robust, transparent and evidence-based as required by guidelines for the preparation of LAPs and Development Plans.

### 4.3 Housing Yield of Zoned Site

Table 3.1 of the Draft Plan sets out the new residential zoned sites with the associated site area and priority. The section titled ‘development potential and density’ in Chapter 3 sets out the following in relation to the provision of housing yields and estimates:

*“In addition to the objectives of the County Development Plan and the Local Area Plan, the development potential of any site will be subject to determination of appropriate density at the development management stage. The application of density ranges will be considered in line with the objectives of the County Development Plan, this Local Area Plan and relevant Planning Guidelines. Density ranges should be based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment. **As the density that may be possible to achieve on any given site cannot be pre-determined, this plan will not include an estimate of housing yield for any particular area / site.**”*

We bring Section 4.5.2 of the Development Plan Guidelines for Planning Authorities, 2022 to the attention of Wicklow County Council:

*“In estimating the housing yield (ie. Number of housing units) from sites identified and zoned for housing, planning authorities must make density assumptions consistent with the appropriate density parameters.”*

Therefore, Table 3.1 of the Draft Plan should contain an estimated density and yield of each residential zoned site to ensure that sufficient zoning is provided within the Plan and to ensure that the ‘Priority’ / phasing of the residential zoned site is appropriate to meet the housing target during the lifetime of the Plan.

We note that Appendix B of the Sustainable Residential Developments and Compact Settlement Guidelines in measuring residential density set out the following:

*“In forecasting the capacity of lands for housing delivery where non-residential uses, such as main roads, retail, employment and major open spaces are being planned in conjunction with housing, an*



*allowance needs to be made in the density assumption for the land that will be occupied by such uses, which may be upwards of 25% when forecasting the capacity of a land area at the neighbourhood or district scale.”*

In any case, the overall density of development and number of units permissible will be determined at detailed design stages based on the overall quality of the scheme and having regard to the various provisions on development management within the applicable development plan along with the relevant Section 28 Ministerial Guidelines. Therefore, using the guidance above, Wicklow County Council should have applied an estimated density provision to 75% of the stated site area of each residential zoned site. We have provided same in the table below applying an average 30 uph density for each site (30 uph was chosen as a modest density as a number of sites closer to the Town Centre would be able to provide a higher density however, some sites are relatively constrained in terms of topography which would reduce the site area considerably, in addition, certain sites may be constrained having regard to the established character and larger sites may be subject to the provision of non-residential uses such as childcare facilities etc.). We refer to the table below.

9 no. sites have been zoned ‘New Residential – Priority 1’ equating to a land bank of 33.3 ha according to Table 3.1. However, having reviewed the accompanying Land Use Zoning Map it would appear that only 8 no. sites are zoned ‘New Residential – Priority 1’. It is our understanding that the site located at ‘Hawkstown Road’ measuring 5.5 ha is not reflected with the appropriate zoning on the zoning map. Nonetheless, our assessment below includes this site for calculation purposes.

Location	Area	Stated Status (Q3 2024)	Planning History	Net Area / Density (75% of site area x 30 uph)	Unit Yield / Permitted Units
<b>RN1 Sites</b>					
Hawkstown Road	5.5 ha	Permission on part of site	Unclear Site Location – Not on Zoning Map	35 uph	Approx. 144 units
Marlton (north of Stream)	4.6 ha	Permission on part of site	Yes – 24/247 / 20/2196 (commencement available)	28 uph permitted	92 units permitted
Marlton (south of stream)	5.9 ha	Live App	Yes – 24/176 (2.3 ha – FI Stage)	36 uph Under consideration	65 units applied for
West of Hawkstown Park	1.6 ha	WCC	Yes – 24/311 (Part 8 Grant)	32 uph	54 units permitted
Hillview	0.9 ha	WCC	No	35 uph	Approx. 24 units
Greenhills Road	1.2 ha	WCC	No	35 uph	Approx. 32 units
Rathnew Village	0.1 ha	WCC	No	35 uph	Approx. 4 units





Rosanna Lower	2.5 ha	Permission on site	Yes – 23/854 (commencement available)	32 uph	80 units permitted
Tinakilly Park	11 ha	Linked to infrastructure	Yes – 23/60219 (under JR)	35 uph	352 units permitted by WCC (JR)
<b>TOTAL</b>	<b>33.3 ha</b>				<b>847 units</b>

Table 2 – RN1 Zoned Sites and Estimated Yield

It is clear from the above that there is insufficient residential zoned as part of Priority 1 to meet the housing target set out for the LAP. The LAP targets 1,619 new residential units to the end of the lifetime of the Plan. If approx. a maximum of 1,133 new residential units (70%) are to be delivered at ‘edge of centre’ sites, the current zoning provision results in a shortfall of lands for 286 no. residential units. **The Planning Authority is asked to review their proposals for delivery of their housing yield and recognise that there is a significant under allocation of appropriately zoned lands in the Draft LAP as it stands.** This shortfall in appropriate land allocation could jeopardise the ability to meet the housing targets, and as such, it is imperative that the Planning Authority adjusts the zoning strategy to ensure that sufficient lands are made available to meet both immediate and future housing needs.

While we acknowledge that the Planning Authority has identified additional sites zoned under ‘Priority 2’ for future development, it is important to note that these sites are only permitted to come forward once 75% of the Priority 1 sites have been activated—specifically, once 25 hectares of Priority 1 zoned lands have been developed. This phased approach will significantly limit the pace at which housing can be delivered, potentially exacerbating housing shortages in the area.

Of the 9 sites currently zoned as Priority 1, it is worth highlighting that 2 of these have an existing valid planning permission, some of which have already commenced or are in the process of being developed. Additionally, several of these sites are actively subject to live planning applications or are under Judicial Review, suggesting that these sites have a realistic potential to deliver the projected housing yield. The presence of active permissions on these sites demonstrates a level of certainty in their development potential, which should be taken into account when considering the overall housing delivery strategy.

However, it should also be noted that 3 sites within the Priority 1 zoning category lack any associated planning history. This raises concerns about the viability of these sites to contribute to the housing supply in the short to medium term as these sites have been zoned for residential use for over a decade. The absence of planning history on these sites could indicate that they may not be as readily developable as the sites with existing permissions, or they may face additional barriers to development. This issue further underscores the need for the Planning Authority to reconsider the overall distribution and allocation of land, particularly in relation to the balance between Priority 1 and Priority 2 sites, to ensure that there are enough viable and appropriately zoned lands available to meet the housing targets. The current Draft LAP approach is not in compliance with the Development Plan Guidelines which state that:

***“development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.”***

In light of this, we strongly urge the Planning Authority to ensure that sufficient flexibility is incorporated into the final Plan. The strict sequencing of Priority 1 and then Priority 2 site activation, as currently proposed, risks unnecessary delays in housing delivery, particularly if the development of Priority 1 lands with planning history faces any unforeseen obstacles. The guidelines clearly advocate for a more adaptable approach that allows other sites—such as suitable Priority 2 sites with recent planning history—to be brought forward earlier if the progress of Priority 1 sites is hindered.





Given the urgency of addressing the significant housing demand in the area, we respectfully request that the Planning Authority take these concerns into account and amend the Draft LAP to reflect a more balanced and realistic approach to residential zoned land allocation. This should include a thorough reassessment of the Priority 1 and Priority 2 site distribution by way of an evidence-based Settlement Capacity Audit, ensuring that sufficient Priority 1 lands are allocated to meet the housing target. We believe that, in light of recent planning history, a number of sites currently zoned as Priority 2 could be re-designated as Priority 1, providing a more immediate and viable solution to the overall national housing shortfall. Such adjustments would ensure that the LAP supports the timely delivery of the housing that is urgently needed, while also aligning with the spirit of the Development Plan Guidelines, which emphasise flexibility and the importance of adaptability in land allocation strategies.

We refer to the table below which notes that 5 out of 11 ‘Priority 2’ sites have no recent planning history or any at all. Our client, the landowner of the site identified as ‘Greenhills Road’ and has a proven track record for the delivery of residential units as outlined in Section 2.1 above and we ask that the Planning Authority reconsider the zoning of this serviced site.

Location	Area	Planning History
<b>RN2 Sites</b>		
Rosanna Lower 1	1.2 ha	None
Rosanna Lower 2	1.1 ha	None
Tighe Avenue	4 ha	None
Ballybeg (Glenealy Rd)	2 ha	Yes – Withdrawn (2360123)
Ballybeg (R772)	8.5 ha	Yes – But not residential use Refused by ABP (ABP-303588-19)
Broomhall	10 ha	None
Ballynerrin (Hawkstown Rd)	5 ha	Yes – Refused (066863)
Ballynerrin (Ashtown Lane)	4.2 ha	Yes – Refused (211536) / Live Application (2460688)
Ballyguile Road	1.8 ha	Yes – Refused (23627)
Bollarny North	6.8 ha	No Recent history
Greenhills Road	3 ha	Yes – Live Application (23914)
<b>Total</b>	<b>47.6 ha</b>	

Table 3 – RN2 Zoned Sites and Planning History





**The Planning Authority is respectfully requested to review their methodology for the allocation of housing targets and review the overall allocation in line with the latest population and housing demand figures prepared by the ESRI.**

**Further, the Planning Authority is asked to review their proposals for delivery of their housing yield and recognise that there is a significant under allocation of appropriately zoned lands in the Draft LAP as it stands.**

**The findings of this analysis is considered critical for consideration by Wicklow County Council. The final LAP for Wicklow Town – Rathnew and must offer a realistic solution to our current housing crisis and must deliver on real potential to meet local demand and particularly, for families.**

**The shortfall of 286 no. residential units represents a significant gap in planning and must be addressed to ensure the sustainable development of Wicklow Town – Rathnew.**

**Therefore, it is imperative that the final LAP includes measures to bridge this gap, by identifying additional sites for residential development. This action is crucial to ensure that the plan meets its objectives and addresses the urgent need for housing in the community.**

**These are key questions that must be addressed in the publication of the final LAP to ensure it provides a robust and effective framework for the future development of Wicklow Town – Rathnew, meeting both current and projected housing needs.**

#### 4.4 Key Findings

From the assessment of population figures and projections for Wicklow Town – Rathnew, and of the nature and quantum of residential development land zoned in the Draft LAP document we draw the following conclusions:

- Cognisance must be had to population growth projections in National and Regional Policy for Wicklow Town – Rathnew and the provision of sufficient zoned land to cater for population growth beyond the life of the plan, with an evidence based and sequential approach to land zoning.
- It is apparent from the assessment of ‘New Residential – Priority 1’ zoned lands that there is real divergence between what is on paper in terms of targets and objectives in various documents and what is going on in reality on the ground in the town of Wicklow – Rathnew.
- The forthcoming LAP for the town must address the current under provision of housing through a strategic designation of land that can, in reality, ‘immediately’ deliver new homes to address the population forecasts and certainly over the LAP plan period. This is easily achievable by way of the appropriate designation and zoning of land that is (a) within the town development boundary, (b) accessible, and (c) serviced.

We urge the Planning Authority to reconsider the reduced growth target and instead adopt a more comprehensive strategy that aligns with the Revised Draft NPF’s vision for compact and sustainable growth. This approach will not only meet the future population demands but also ensure that Wicklow Town – Rathnew fully benefits from its strategic location and planned infrastructure investments, fostering a resilient and thriving urban environment.

**However, it is our view that the Draft LAP as published has failed to:**

- **Include accurate population growth and housing yield projections;**
- **Include appropriately zoned residential lands;**
- **Allocate our clients lands an appropriate residential zoning.**



## 5 Request for Rezoning

As set out at the beginning of this submission, our client owns a approx. 7.52 ha at Mariner’s Point, Greenhill Road, Ballyguilemore, Wicklow. These lands are considered opportune for a rezoning proposal from ‘New Residential – Priority 2’ to ‘New Residential – Priority 1’, in order to provide for the future housing needs of Wicklow Town.

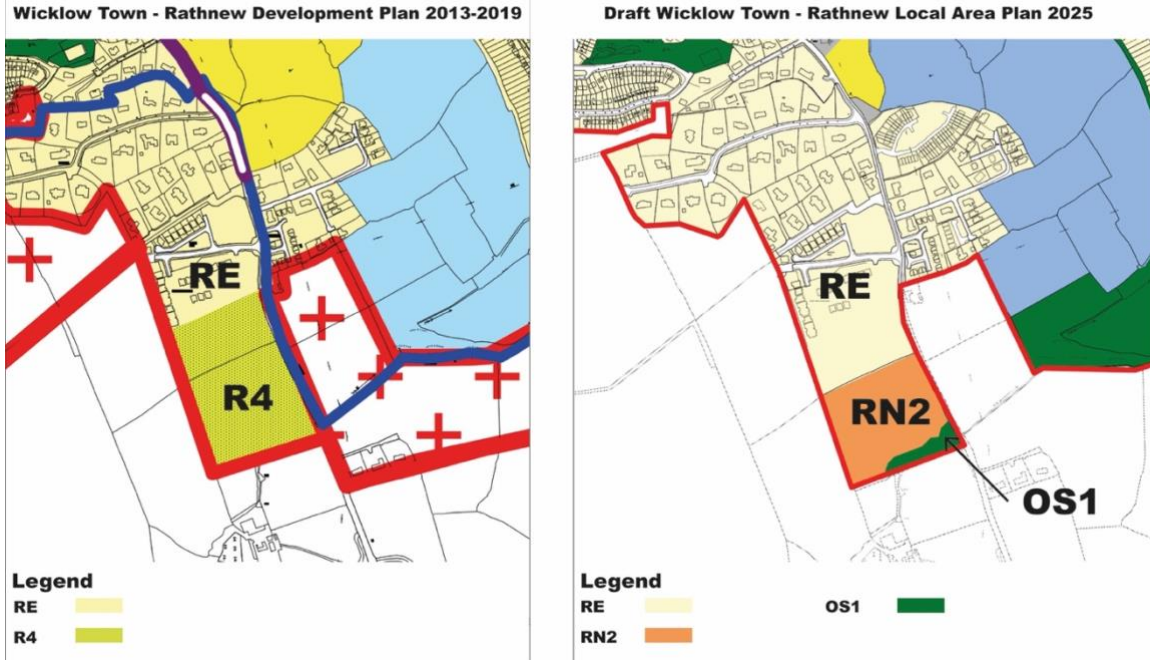


Figure 7 – WTR Development Plan 2013-2019 Zoning vs Draft WTR LAP 2025 zoning

This section sets out a clear planning argument in support of this rezoning, which coupled with consideration of the clear challenges faced by the currently proposed draft residential zonings that makes the subject site for an appropriate proposal for rezoning.

### 5.1 Site History

This section details the recent and relevant planning history for the site at Mariner’s Point. Phase 1 for 74 no. units is permitted and under construction. Phase 2, is a live application for 47 no. units and the subject of this re-zoning as ‘RN New Residential Priority 2’ lands, is under consideration by WCC, at this time.

Planning Reference	Description	Status
23/914 Phase 2	56 no. residential units, the provision of 110 no. car parking spaces, all pedestrian and vehicular access roads and footpaths will link to the northern Phase 1 of the overall development, all associated site and infrastructural works.  Overall number of units reduced to 47 units at RFI Stage.	Further Information/Revised Notices Received: 2 October 2024 / 9 October 2024  <b>Decision Due: 3 December 2024</b>

23/60258 Modifications to 22/504 (Phase 1)	House type revision to 1 no. permitted unit from 2 storey 4 bed detached to dormer 3 storey 5 bed detached. No change to units quantum.	Granted: 29 November 2023
23/284 Modifications to 22/504 (Phase 1)	House type revisions to 4 no. permitted units from 2 storey 3 bed semi-detached to dormer 2 bed semi-detached. No change to unit quantum.	Granted: 29 June 2023
22/504 Phase 1	74 no. residential units, proposed open space totalling c.5,111sqm in area and all associated site development works and services provision.	Following receipt of further information, permission was granted on <b>24 February 2023</b> subject to 28 no. conditions.

Table 4 – Recent Planning History at Mariner’s Point

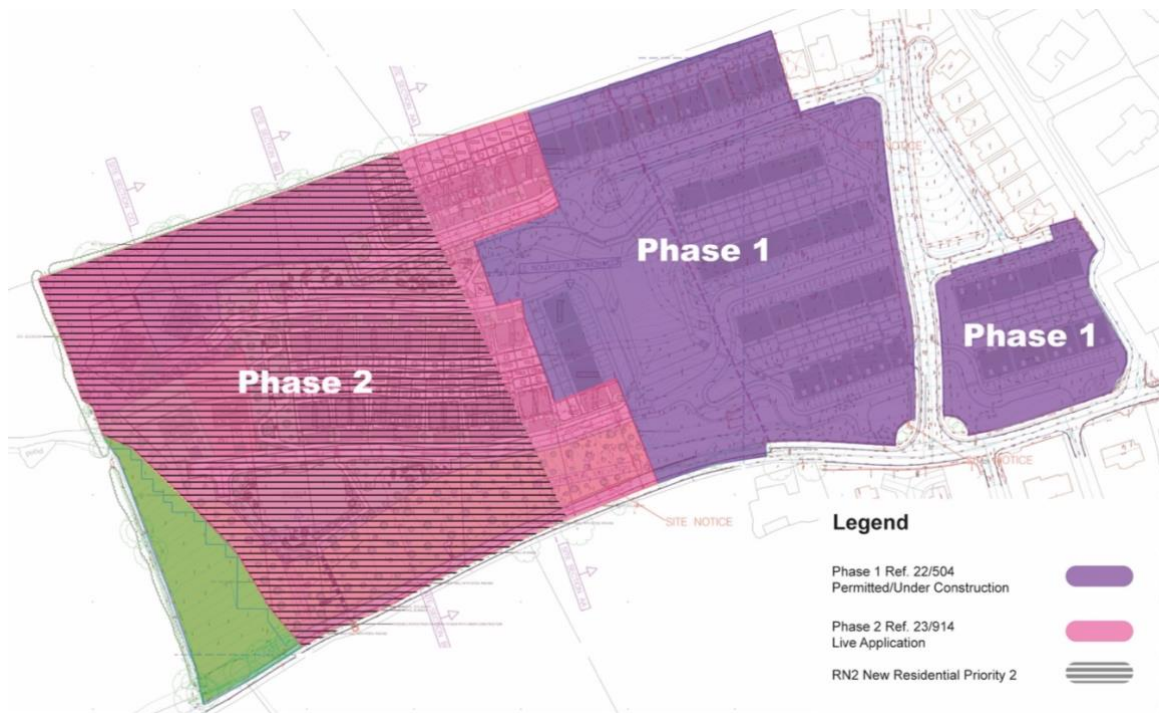


Figure 7 – Site Layout submitted at FI under Ref. 23/914 (Phase 2 shown highlighted to the south of the overall site)

We note that the Applicant has owned the site since 2021, during which time significant progress has been made towards the development of the area. Since acquiring the site, the Applicant has secured planning permission for Phase 1, which is currently under construction. The Planning Authority will be aware that a live planning application for Phase 2 (Ref. 23/914) is currently being assessed by Wicklow County Council (WCC), with a decision anticipated by 3 December 2024.

In this instance, a live application that has been months in planning demonstrates the Applicant’s intention to construct the development. It serves as tangible evidence of the Applicant’s intention to continue with the development and implement the overall vision for the site.

The overall vision for the site, including Phases 1 and 2 was made available in the planning application for Phase 1. Prospective buyers of Phase 1 Mariner’s Point purchased their dwellings on the premise that a second phase of development would be constructed on the remaining lands. The proposed **Phase 2** is not merely an extension of Phase 1 but is integral to the cohesion and functionality of the



development as a whole. Phase 2 not only consolidates the built form but integrates open space, services and internal road network, with the adjoining Phase 1 Mariner's Point.

**To include the site as a Priority 2 zoned site would be detrimental to the vision of the overall development site and to the quality of the environment for existing/future residents of Phase 1 Mariner's Point.**

**The live application for Phase 2 Mariner's Point bridged the gap at this transitional site. To downgrade the subject site as a Priority 2 zoned residential site would result in the abrupt transition between a partially constructed development (Phase 1) and open countryside, which is inconsistent with proper planning and the sustainable development of the area.**

A gap between Phase 1 and Phase 2 would not only hinder the completion of an integrated community but could also negatively impact the experience of current and future residents who would be left with an incomplete and disjointed development.

**Having regard to the above, we request that the subject lands are zoned Priority 1 lands under the Wicklow Town – Rathnew LAP 2025.**

## 5.2 Accessible, Services, Readily Available Lands

### Accessibility

The subject lands at Mariner's Point benefit from substantial site services and network of road / footpaths serving the occupied dwellings to the north. The lands are located less than 1 km from nearby schools and bus services and c. 1.2 km from retail services and facilities in Wicklow Town Centre, connected by a continuous footpath.

We highlight the locational attributes of the subject site which is adjacent to the town boundary and within the development boundary of the existing LAP, coupled with planned infrastructure projects forming a natural extension of the settlement. There is a clear opportunity for efficient and suitably intense housing to be brought forward on this site which will ultimately form part of a much wider existing residential offering in Wicklow Town.

We refer the Planning Authority to the Ballyguilemore Footpath Part 8 Scheme under Reg. Ref. 23643 which proposes to provide new pedestrian facilities and road safety improvements along Ballyguilemore Road between Carrig View and the entrance to the proposed new St. Patricks GAA Pitch. This scheme proposes to include new footpath, public lighting, boundary fencing and hedgerow, and road widening works. This will form a natural extension of the settlement boundary and will bring appropriate new public infrastructure directly adjacent to the subject site.

### Services

The site also has access to services including power supply, water supply, foul drainage, surface water drainage and telecommunications and therefore there would be no impediment to development in this regard.

In addition to the above, we note that it was determined by the Wicklow County Council on 23<sup>rd</sup> March 2023 (Ref. WW-RZLT-39, refers) that the subject lands fulfil the qualifying criteria for inclusion on the RZLT map for the following reasons:

1. *"The lands in question are included in a development plan or local area plan and is zoned for residential development or zoned for a mixture of uses, that includes residential development.*
2. *The lands are serviced, or it is reasonable to consider may have access to services. Serviced means having access to necessary public infrastructure and facilities including road and footpath access, public lighting, foul sewer drainage, surface water drainage and water supply necessary for dwellings to be developed and for which there is service capacity available sufficient to enable housing to be developed.*
3. *The lands are not affected in terms of its physical condition, by matters to a sufficient extent to preclude the provision of dwellings, including contamination or the presence of archaeological or historic remains."*





Therefore, given the accessibility of the site, the fact that it has access to services from both a power and water perspective, and that the landowner is ready and willing to bring the site forward for immediate residential development, subject to the necessary planning procedures, it is submitted that the subject lands at Mariner’s Point, Greenhill Road are appropriate for a rezoning from ‘New Residential – Priority 2’ to ‘New Residential – Priority 1’ use in the forthcoming LAP for Wicklow Town - Rathnew.

The rezoning of the site at Mariner’s Point to ‘New Residential – Priority 1’ is a strategically sound and timely proposal that aligns with local, regional, and national planning objectives. It addresses the immediate housing shortfall in Wicklow Town, supports sustainable and inclusive community growth, and enhances the overall area. We urge Wicklow County Council to consider the rezoning proposal’s favourably to ensure the continued growth and development of Wicklow Town in a planned and sustainable manner.

We trust the foregoing sets out a reasonable rationale for the rezoning of the subject site and adequate justification is provided to allow this greenfield, underutilised site to be brought forward for development in a sustainable manner to promote compact growth in line with national, regional and local policies.

We therefore invite the Planning Authority to amend the Draft LAP Zoning Map as follows:

**To illustrate the subject site at Mariner’s Point rezoned from zoning objective RN2 – New Residential Priority 2 to zoning objective RN1 – New Residential Priority 1.**

***Reason:*** *In the interest of proper planning and sustainable development of the area.*





## 6 Conclusion

Having reviewed the content of this submission, the Planning Authority is now formally requested to:

- 1. Review their housing yield allocations for Wicklow Town – Rathnew and ensure that their analysis is accurate and evidence based in accordance with the latest population growth and housing yield projections of the RSES, NPF and ESRI.**
- 2. Zone sufficient lands to deliver on housing projection forecasts for Wicklow Town and Rathnew.**
- 3. Allocate our clients lands an appropriate residential zoning at Priority 1 that can deliver residential units within the lifetime of the LAP.**

The Planning Authority is asked to review their proposals for delivery of their housing yield and recognise that there is a significant under allocation of appropriately zoned lands in the Draft LAP as it stands.

The findings of this analysis are considered critical for consideration by Wicklow County Council. The final LAP for Wicklow Town - Rathnew must offer a realistic solution to our current housing crisis and must deliver on real potential to meet local demand and particularly for families.

The shortfall of 286 residential units represents a significant gap in planning and must be addressed to ensure the sustainable development of Wicklow Town.

Therefore, it is imperative that the final LAP includes measures to bridge this gap, by identifying additional sites for residential development of Priority 1. This action is crucial to ensure that the plan meets its objectives and addresses the urgent need for housing in the community.

These are key questions that must be addressed in the publication of the final LAP to ensure it provides a robust and effective framework for the future development of Wicklow Town - Rathnew, meeting both current and projected housing needs.

In this regard, we urge the Council to prioritise 'ready to go' and serviced / serviceable sites for housing development, rather than relying on historically zoned residential lands to come to fruition. Having consideration of all the above, it is submitted that our clients' lands at Mariner's Point, Greenhill Road are appropriate for and favorable to residential use in this regard. As outlined, this site is immediately available from a development perspective, pending the required rezoning from 'New Residential – Priority 2' to 'New Residential – Priority 1'.

As such, favourable consideration should be given by Wicklow County Council to these lands to provide for the future housing need of Wicklow Town - Rathnew for the reasons and rationale contained herein.

