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County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town

Monday, 30th August 2021

Dear Sir/ Madam,

RE: SUBMISSION IN RESPECT OF THE *DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027* RELATING TO LANDS PROPOSED TO BE DE-ZONED AT ROUNDWOOD, COUNTY WICKLOW.

1.0 INTRODUCTION

1.1 Purpose of this Submission - Oppose the Proposed De-zoning of the Subject Lands Which Are Located in the Core of Roundwood

Thornton O'Connor Town Planning¹ have been retained by the Joseph and Ann McDonald² to prepare this Submission to Wicklow County Council in relation to lands located in the core of Roundwood which are currently zoned for development (with a planning application design team instructed and progressing with a scheme) and are proposed to be de-zoned under the *Draft Wicklow County Development Plan 2021 -2027* (Draft Plan). It should be noted that Joseph and Ann McDonald have formed a partnership with a local developer Real Estate Project Partners over the past 8 months and it is the partnership intention to develop the site in the short term.

The final day for Submissions on this phase of public consultation is Monday, 30th August 2021. The lands subject to this Submission are shown in Figure 1.1 below.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14 D14 EA89

² Vartry Lakes Golf Course, Roundwood, Co Wicklow



Figure 1.1: Map Showing the Location of the Lands Subject to this Submission Outlined in Red

Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021

Key Point: The purpose of this submission is to oppose the proposed de-zoning of the subject lands proposed as part of the *Draft Wicklow County Development Plan 2021-2027*. As part of these amendments, the subject lands are proposed to be de-zoned from their current 'Secondary Development Area' zoning to unzoned lands outside the settlement boundary of Roundwood. The lands are part brownfield and are located in the core of the town. The lands also have significant potential for connectivity and linkages to adjacent landholdings including a recently permitted residential development to the north (beyond the OPW landholding) and also to provide connectivity to the amenity presented by the Vartry Reservoir walkways (which are currently not accessible from the town centre).

1.2 Format of Submission

The following is the format of this submission:

Section 1 provides the **Introduction of the Submission**;

Section 2 provides an **Overview of Subject Lands – Location, Description, Context and Planning Status**;

Section 3 provides an overview of the **Suitability of Subject Lands for Residential Development in the Context of Local and National Policy**

Section 4 provides details of the **Suitability of the Subject Lands for Residential Development**



Section 5 provides an Overview of the **Housing Need in Roundwood**;

Section 6 provides the **Conclusion**.

2.0 OVERVIEW OF SUBJECT LANDS - LOCATION, DESCRIPTION, CONTEXT AND PLANNING STATUS

2.1 Location and Description of Subject Lands

The subject lands measure 4.6 hectares and are accessed off the R764. The south-western section of the lands are currently zoned for development (2.7 Hectares) with the balance of the lands at the north-eastern side of the site positioned within the Vartry Reservoir buffer zone (1.9 Hectares) The general topography of the lands fall as it reaches the reservoir.

The lands are currently categorised in the current *Roundwood Local Area Plan 2016-2022* as RD4, which are identified as being located in the 'Secondary Development Area'. The southern section of the lands have an existing carpark from the old golf club building with circa 85 surface car-parking spaces located off the R764 (Churchmount Road). The lands are thus part brownfield with a redundant use and present a clear development opportunity.

2.2 Surrounding Context of Subject Lands

The subject lands are located 220m (c. 3 No. min walk) from the Garda Station which is physically located in the centre point of the village.

Roundwood is situated in County Wicklow west of the N11 route on the R755 Regional Road, approximately 13km west of Ashford, 10km from Newtownmountkennedy, approximately 9km north of Laragh and 20km south of Bray. Roundwood adjoins the Vartry Reservoir and along with Laragh, serves as a principal gateway to the Wicklow Uplands. Roundwood contains a National School, Catholic Church, 5 No. public houses/restaurants, local convenience shops, GAA facility, community centre, caravan park, Post Office and health clinic.

The population of Roundwood from the last census 2016 was 946 No. rising to 987 No. in 2021. It should be noted that Variation 1 of the *Wicklow County Development Plan 2016-2022* provided a population projection of 1,052 No. persons for Roundwood up to 2022.

The *Draft Wicklow County Development Plan 2021 -2027* settlement typology categorises Roundwood as a small town type 2 in the settlement hierarchy.

2.3 Planning Status of the Subject Lands

2.3.1 Previous, Current and Proposed Zoning of Subject Lands

The subject lands are currently zoned 'Secondary Development Area' as part of the *Wicklow County Development Plan 2016-2022*.

In the previous *Roundwood Town Plan 2007-2010*, the lands were zoned for employment and residential use. It should be noted that the residential was 'Phase 1' residential with more peripheral sites around the town (many of which remain zoned) being designated as 'Phase 2'.

The lands are now proposed to be de-zoned and moved outside the settlement boundary of Roundwood as part of the *Draft Wicklow County Development Plan 2021-2027* as shown in the following 2 No. figures:

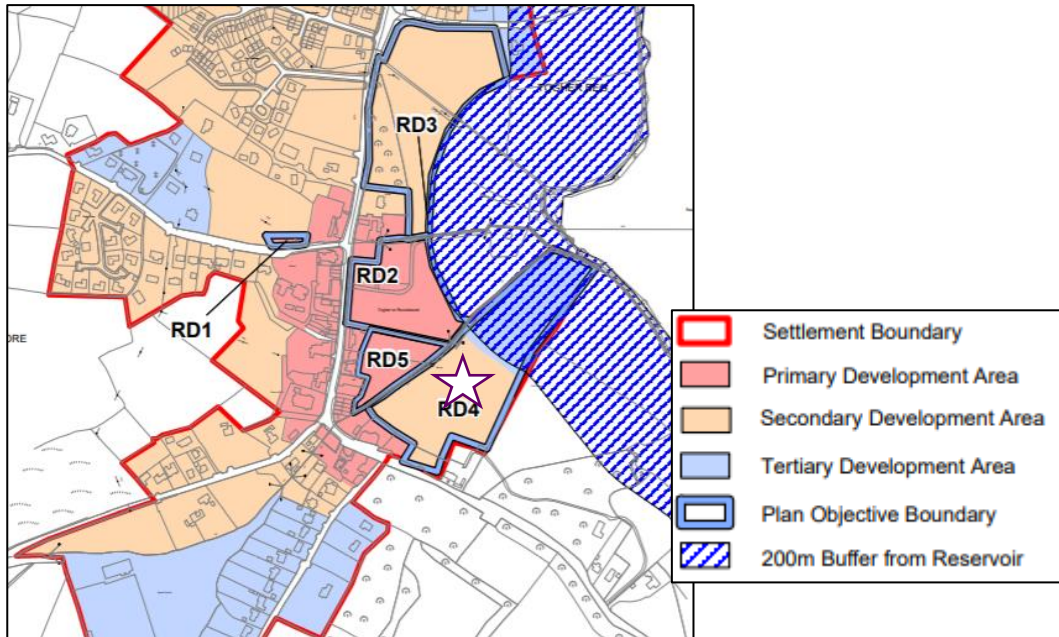


Figure 2.1: Current Zoning of the Subject Lands (Identified by a Star)

Source: *Roundwood Local Area Plan 2016-2022*, annotated by Thornton O'Connor Town Planning, 2021.

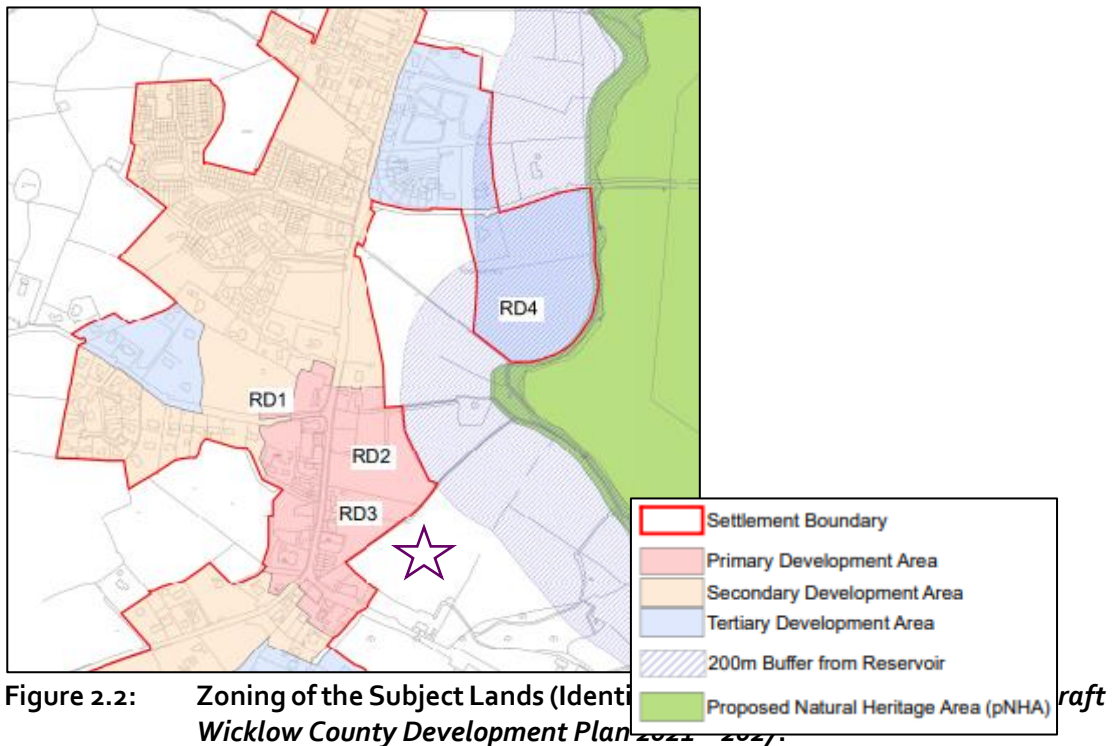


Figure 2.2: Zoning of the Subject Lands (Identified by a Star) in the *Draft Wicklow County Development Plan 2021-2027*.

Source: *Draft Wicklow County Development Plan 2021-2027*, annotated by Thornton O'Connor Town Planning, 2021

Key Point: As detailed throughout this Submission, the rationale for de-zoning the subject lands is unclear. The subject lands are of brownfield status, located in the core of the town and have clear opportunities to create permeability and linkages which would be a significant benefit to the village.

As demonstrated by the maps in Figures 2.1 and 2.2 above, the town of Roundwood is envisioned in the current Development Plan to 'wrap around' the reservoir and its buffer zone, maximising the opportunities for visual amenity and recreational amenity presented by this key asset to the village.

In contrast, the village form is now envisaged in the *Draft Plan* to turn its back on the reservoir and instead remove itself from the reservoir, growing in a more linear form that focuses growth on the western side of the village. From an urban design perspective, we question why such a major asset to the settlement is being ignored? We respectfully submit that the recreational and visual amenity benefits of the reservoir should be harnessed in the growth plan for the village with the urban form developing up to the reservoir buffer zone and providing direct linkages to existing recreational routes at the reservoir.

3.0 SUITABILITY OF SUBJECT LANDS FOR RESIDENTIAL DEVELOPMENT IN THE CONTEXT OF NATIONAL AND LOCAL LEVEL POLICY

3.1 National Planning Framework Encourages Growth in Sustainable Locations

The *National Planning Framework: Ireland 2040* (NPF) is the Government's high-level strategic plan for shaping the future growth and development of Ireland to the year 2040. Since February 2018, the National Planning Framework has replaced the National Spatial Strategy (NSS) and now represents the overarching national planning policy document. The NPF states that developments must be supported by:

*'...enhanced connectivity, quality of life, strengthened urban cores and more **compact housing in urban settlements.**'* [Our Emphasis]

The NPF principally promotes compact growth and seeks the appropriate development of sites such as the subject lands within comfortable walking distance of a range of local amenities.

Key Point: We submit that the proposed de-zoning of the subject lands further pushes residential development away from the core of Roundwood Village, leading to the creation of car dependent communities. Instead, retaining the secondary zone at the subject lands would enable the provision of a primarily residential development that would achieve compact growth and increased quality of life.

The NPF aims to achieve more compact housing through the National Planning Policy Objective 3c, which aims to:

*'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, **within their existing built-up footprints.**'* [Our Emphasis]

The National Planning Policy Objective 33 sets out that developments should:

*'Prioritise the provision of new homes at **locations that can support sustainable development** and at an appropriate scale of provision relative to location'.* [Our Emphasis]

Key Point: The subject brownfield lands are ideally suited for a scheme largely comprising residential development and can deliver a high quality of residential amenity in close proximity to Roundwood village. Cantrell Crowley Architects had previously been retained by our Client to prepare a planning application in respect of the subject lands (prior to the publication of the *Draft Plan*). Whilst that application is now on hold, a concept sketch is provided with this Submission which demonstrates the vision to provide a medium density scheme with a public car parking area to serve the town. The car parking area is envisioned at the location of the current car park that formerly served the Golf Course.

The scheme as envisioned would provide much needed houses on brownfield lands within the core of the village. The scheme would also provide public car parking which is a significant issue for Roundwood particularly in the summer months when tourists are trying to avail of the shops and services of the settlement. Pedestrian connections are also envisaged to increase permeability and ensure the safety of future residents and car park users.

3.2 Local Policy Emphasis on Sequential Development

Section 1.2 of the *Draft Wicklow County Development Plan 2021-2027* relates to the phasing objective of the Council and states that:

'Development is undertaken in an orderly and sustainable manner. The development of zoned land should generally be phased in accordance with the sequential approach.' [Our Emphasis]

'Development should extend outwards from the primary area with undeveloped land closest to the core and public transport routes (where applicable) being given preference; this will normally correspond to the 'secondary area'. [Our Emphasis]

'Leapfrogging' to peripheral areas, such as the outer edge of the secondary area or the tertiary zone should be avoided.' [Our Emphasis]

'A strong emphasis should be placed on encouraging infill opportunities and better use of underutilised lands.' [Our Emphasis]

'Areas to be developed should be contiguous to existing developed areas.'

Key Point: The RD2 lands have recently been granted planning permission for a mixed use scheme (WCC. Reg. Ref. 20/1087) and that scheme is due to proceed to site within the coming months. The RD3 lands (to the south-west of the RD2 site and formerly labelled RD5) are in the ownership of the OPW and thus are unlikely to be developed in the short-medium term. Thus, the subject lands, which directly abut part of the RD3 lands along its south eastern boundary (see the yellow zig zag in annotation below) are ideally positioned to ensure the sequential development of the settlement.



Figure 3.1: Permitted Landscape Plan at the RD2 lands (WCC Reg. Ref. 20/1087) Showing the Relationship with the Subject Lands.

Source: Landscape Plan as abstracted from WCC Reg. Ref. 20/1087 and annotated by Thornton O'Connor Town Planning to Show Sequential Location of Subject Lands

As shown by Figure 3.1 above, the subject brownfield site is contiguous to a site to be developed and its development would thus represent the sequential development of the settlement, promoting connectivity and linkages to adjacent lands.

In determining the priority locations for new residential development, the first objective as set out in the *Draft Wicklow County Development Plan 2021-2027* is:

*'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.'* [Our Emphasis].

We outline that the subject lands address the criteria as a first priority:

- The lands have an existing car park and clubhouse to the south and as such would come under a brownfield classification.
- The land adjoins the village and is sequentially the next site available for development and is also within close proximity to the local services.
- The lands are easily serviceable.

Key Point: It is noted that a number of the lands with the same classification as our Client ('Secondary Development Area') albeit located further towards the periphery of the village are proposed to be maintained as Secondary Development Areas in the *Draft Plan*. The vast majority of such lands are sequentially further from Roundwood village and its services. The rationale for proposing to remove the Secondary Development Area zoning that pertains to the subject lands is thus unclear. It is respectfully considered that the subject lands should remain within the 'Secondary Development Area' in the interests of sequential development, avoidance of leapfrogging and to ensure the proper planning and sustainable development of the village.

4.0 SUITABILITY AND PLANS FOR A DEVELOPMENT AT THE SUBJECT LANDS

4.1 Services and Infrastructure

Our client and their retained engineers understand from Irish Water that the water supply is available to cater for any development on the lands and is accessible on the main road. Additionally, the old Golf Club had a water supply.

The Wastewater treatment plant is located within 30m from the northwest boundary, and the *Draft Plan* confirms that there is spare capacity in the system to cater for moderate growth of the settlement.

In relation to surface water, we are advised from the design teams initial investigations that the ground conditions do favour the installation of a local drainage solution.

4.2 Details of the Concept Stage of the Proposed Development at the Subject Lands

Our client has been engaged with a local developer Real Estate Project Partners who have commenced the initial stage of the development cycle and had engaged Cantwell Crowley Architects to develop a scheme that complements the existing and proposed residential uses in the village. This scheme was set to move to pre-planning but has been held for now pending the making of the Development Plan.

The initial design concepts are enclosed as Appendix A of this Submission and demonstrate the proposed development of 50 No. residential units and a village car park to cater for the current undersupply of parking for the village core.

This scheme has a proposed medium density of 19 units per hectare to cater for people looking for larger family homes in the locality and to provide a more sustainable alternative to one-off housing in the countryside. The density envisaged is intended to complement the adjacent RD2 development site (WCC. Reg. Ref. 20/1087) which is permitted to provide a higher density scheme. The two schemes will ensure a range of house types and housing choice for the locale.

4.3 Potential to Deliver Connected Communities and Encourage Active Travel

We respectfully submit that the current zoning of Roundwood village allows for the delivery of connected communities to the eastern side of the Main Street. A key benefit of the Planning Authority's vision in this regard is the delivery of deliver connected communities away from the trafficked Roundwood Main Street.

For example, the current RD2 lands are required to provide connections to the RD5 lands to the South. The RD5 lands are required to further continue this connection to the subject RD4 lands. This vision is essentially obliterated under the revisions proposed in the *Draft Plan*.

Key Point: The subject lands hold significant potential in delivering a high quality of residential amenity but also can deliver connected communities away from the trafficked Roundwood Main Street.

There has already been an approved link between RD2 and RD5 Lands (WCC. Reg. Ref. 20/1087). This permitted connection can be viewed in the Figure below:



Figure 4.1: Approved Connection Between RD2 and RD5 Lands as shown on Landscape Masterplan

Source: Wicklow County Council Planning Reference 20/1087, Annotated by Thornton O’Connor Town Planning, 2021.

The subject lands to which this Submission relates represents a natural extension of the RD2 and RD5 lands in Roundwood and can help facilitate active travel in the area.

Furthermore, the subject lands can help to link Roundwood Village with the Lower Vartry Trail which skirts around the perimeter of the Lower Vartry Reservoir, meaning walkers that wish to enjoy the trail can directly access the trail from the core of the Village.

4.4 Locational Overview of Subject Lands Versus Other Zoned Sites

We wish to highlight the locational advantage of the subject site versus other sites in the town that are zoned for Development in the town (but are located much closer to the periphery). To provide a fair comparison, the Roundwood Garda Station on the Roundwood Main Street will be taken as the centre of Roundwood as it is situated in the centre of the ‘Primary Development Area’ of Roundwood.

The focus of the comparison will be on Secondary Development Areas in Roundwood which have a stated vision:

‘To provide for the sustainable development of a mix of uses including residential, employment, community and recreational uses that provide for the needs of the existing settlement and that allows for the future growth of the settlement.’

The subject lands are zoned as a 'Secondary Development Area' as part of the current *Wicklow County Development Plan 2016-2022* and is now proposed to be de-zoned as part of the *Draft Wicklow County Development Plan 2021 -2027*. The two relevant objectives of Secondary Zones are as follows:

- 'Allow for new residential developments, including a mix of residential options within an attractive and accessible setting, at appropriate locations which have **safe access to the public road network**, which have **pedestrian links to the primary lands**, and which are **served by appropriate water and sewerage infrastructure**, and which, if possible are in **proximity to community and public services**.' [Our Emphasis].

- 'A full range of unit sizes, including smaller 2 and 3 bedroomed units shall be provided in all new housing developments (i.e. developments exceeding 4 units).'

In an effort to demonstrate the suitability of the lands for their future residential development, we have prepared the following comparison with sites that remain zoned.

	Subject Site	Site No.1	Site No. 2	Site No. 3
Distance from Roundwood Garda Station	220 metres (c. 3 No. min walk)	560 metres (c.7 No. min walk)	430 metres (c.5 No. min walk)	470 metres (c.6 No. min walk)
	Direct Pedestrian Links to Primary Lands	No Pedestrian Links to Primary Lands	No Pedestrian Links to Primary Lands	No Pedestrian Links to Primary Lands

Table 4.1: Proximity of Lands to Roundwood Garda Station in Primary Development Area

Source: Thornton O'Connor Town Planning, 2021



Figure 4.2: Aerial View of the Subject Lands and Surrounding Zoning Context

Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021

The subject lands perform significantly better than a number of existing and proposed 'Secondary Zoned Lands' in Roundwood in relation to proximity to Roundwood Village and pedestrian connectivity to primary lands yet it is unclear why the other sites have been zoned and the subject lands are not?

Key Point: It is unclear why the 'leapfrogging' of the subject lands is taking place as lands on the periphery of the 'Secondary Development Areas' of Roundwood are retaining their zoning?

5.0 HOUSING NEED IN ROUNDWOOD

5.1 The Current Supply of Housing is Significantly Failing to Address the Critical Demand Locally

A search of properties for sale in the Roundwood area on the 24th August 2021 has demonstrated that there is 1 No. house and 3 No. sites for sale in the area. The house is for sale for €585,000 and the sites range from €155,000 to €1,000,000. Thus, it is clear that there is no choice for anyone wishing to buy a home in the settlement and for the many people on average incomes the only house for sale in the locality would be unobtainable due to its price.



Figure 5.1: Number of Units for Sale in Roundwood Area with Subject Lands (Identified by a Star).

Source: Daft.ie, annotated by Thornton O’Connor Town Planning, 2021.

A review of suitable properties for rent in the Roundwood Area showed that there is just one house available which has one bedroom and a monthly rent of €1,250.

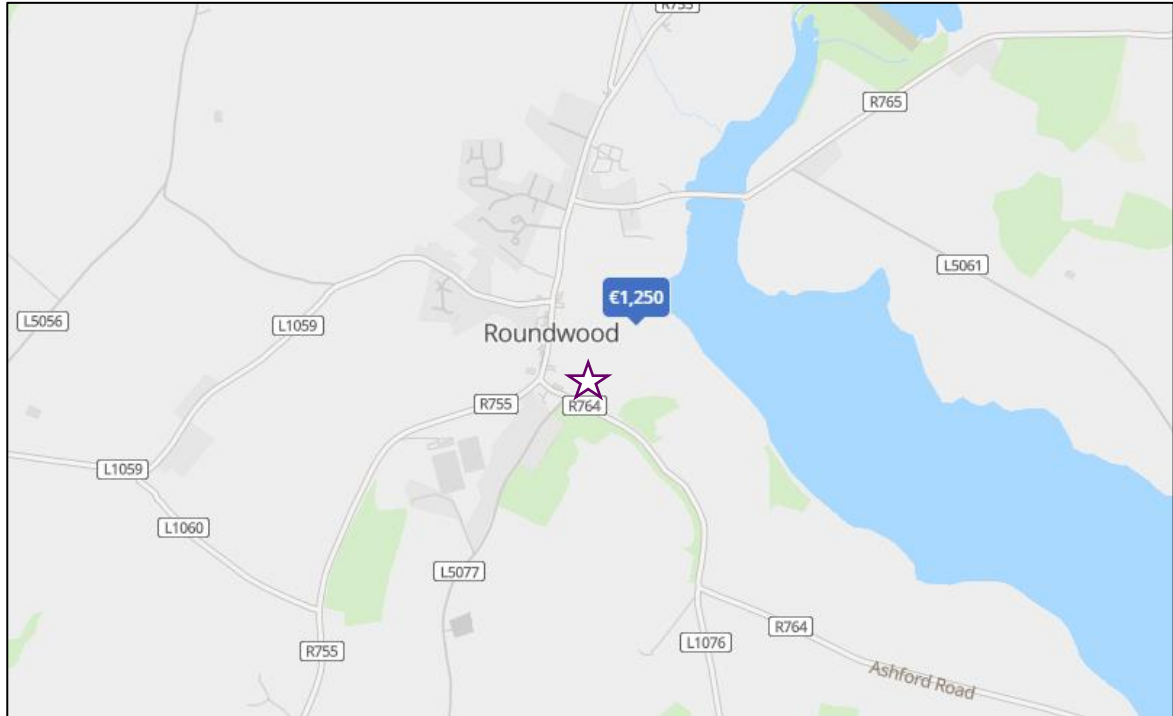


Figure 5.2: Map Showing 1 No. Property for Rent in the Roundwood Area with Subject Lands (Identified by a Star)

Source: www.Daft.ie

The subject lands, which prior to the publication of the *Draft Plan* were actively being brought forward for development, have potential to deliver much needed homes of varying scales in the core of the village.

5.2 Roundwood and the Increase in Remote Working

With the emergence of remote working from the Covid-19 pandemic, more and more people who are originally from rural areas are choosing to remain there as the need to commute to an office has been removed for many. There is a growing need for an increased supply of units in rural areas that can serve this increasing number of people. Covid 19 has created an opportunity to ensure that settlement patterns that became commonplace during the Celtic Tiger with rampant urban sprawl are not repeated, as demand for housing rises.

Key Point: The subject lands to which this submission relates has the potential to consolidate Roundwood Village and serve to render 'best practice' permeable and connected communities commonplace in Roundwood.

6.0 CONCLUSION

The purpose of this submission is to oppose the proposed de-zoning of the subject lands proposed as part of the *Draft Wicklow County Development Plan 2021-2027*. The subject lands are proposed to be de-zoned from their current 'Secondary Development Area' zoning to unzoned lands despite their brownfield status and their location within the core of the settlement and directly adjacent to a permitted development that is to commence construction in the coming months.

Our Client plans to deliver a key link between Roundwood Village and the Varty Reservoir walk which is a key objective under the *Roundwood Local Area Plan 2016-2022*. Roundwood has all the required local services with schools, Garda station, shops, pubs, restaurants, health clinic to cater for additional housing in the area. The lands are also envisaged to provide urgently needed additional public car parking for the village.

The lands are sequentially the next available lands to be developed in Roundwood (as the lands extend to the boundary with the RD2 lands) and preparation for a mixed use planning application comprising residential development and car parking has commenced. The envisioned residential units would provide suitably located homes that could serve needs of an increasing population and help to increase supply of housing in a time of a worsening housing crisis nationally and a significant increase in persons returning to their locality due to the advantages of remote working.

We are strongly of the opinion that the town of Roundwood should not turn its back on the Vartry reservoir but instead its growth direction should focus on embracing the reservoir and harnessing such a significant asset whilst respecting the buffer zone. On this basis we would urge the Council not to focus the growth of the town on its western side and to instead provide more balanced sequential growth working outwards from the primary development zone.

We trust that due consideration will be given to the role of the subject lands in the overall future development of Roundwood.

Thank you for considering this proposal.

Yours Sincerely



Sadhbh O'Connor
 Director
 Thornton O'Connor Town Planning



Appendix A: Concept Plan for Subject Lands Developed by Cantrell and Crowley Architects