

Our ref: Kilcrone

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Forward Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town,
A67 FW96.

RE: DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027 SUBMISSION

Dear Sir/ Madam,

RPS has been instructed by the Legionaries of Christ to prepare a submission in response to the publication of the Draft Wicklow County Development Plan 2021-2027. This submission relates to lands at Kilcrone, Co. Wicklow.

The Draft Plan is generally welcomed, and it is respectfully requested that the contents of this letter are taken into consideration when publishing the final version of the *Wicklow County Development Plan 2021-2027*.

1.0 Subject Lands – Kilcrone House and Estate

The subject lands comprise Kilcrone House and estate, Co. Wicklow currently occupied by Oaklands Academy male boarding school. The lands are just outside of Bray adjacent to the Kilcrone access onto the northbound lane of the N11/M1.

The lands are bound by hedgerow to the north with the River Dargle Valley nursing home further beyond, the N11 to the east of the site and the River Dargle to the west. The south of the site is bound by Kilcrone Lane which provides local access to nearby residential properties.

The lands comprise:

- Kilcrone House (a Protected Structure)
- A three storey dormitory block
- Sports hall
- Caretaker house
- Ancillary facilities

Built in 1835 as a country house, it was used as a hotel (1933), a golf and sports club (1951), a St John of God Juniorate school and place of retreat (1955), and since 1993 it has been the location of Dublin Oak Academy.

In the last couple of years Dublin Oak Academy's operation has significantly reduced in scale compounded by the effects of Covid-19 with the student population returning home for the duration of the pandemic.

Our client is looking for a local policy objective to acknowledge the long-established institutional use and infrastructure on site; and providing for a future retirement / nursing home village.

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Figure 1: Lands at Kilcroe

2.0 Policy and Legislative Context:

The overarching planning policy context is set out in the *National Planning Framework 2040* (NPF) and the *Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019* (EMRA). Having regard to section 10(A) of the *Planning and Development Act 2000* (as amended), the Plan should also have regard to specific planning policy requirement contained within Section 28 Guidance.

2.1 The National Planning Framework 2040

The *National Planning Framework 2040* (NPF) sets out guiding principles to cater for the future population growth of older people in Ireland. People aged over 65 will more than double to 1.3 million by 2040, making up approximately 23% of the population, an increase from 13.5% in 2016.

It is government policy to “support older people to live with dignity and independence in their homes and communities for as long as possible. In providing a more seamless and appropriate continuum of housing choices with appropriate supports for older people in a built environment that is attractive”.

The NPF ensures government policy is met and aims to provide multidisciplinary care for older people. The NPF sets out four core objectives with regard to older people and the provision of accommodation including:

1. “The replacement and upgrade of 90 Community Nursing Units and the provision of additional step-down and long-stay accommodation;
2. The development of community based housing with supports;
3. A Palliative Care Programme; and
4. Additional capacity through long-term residential care beds to meet demographic needs and additional short-term beds to deliver an improved model of care for older persons”.

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The principles set out in the NPF explicitly support the need for accommodation specific to older people and their needs. It is evident throughout the NPF, inclusive of the four objectives above, that additional step-down units, sheltered housing, nursing homes, older resident complexes and similar developments are required to deal with our aging population by 2040.

2.2 The Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (RSES) supports the implementation of the NPF and provides a long-term strategic planning and economic framework for the eastern and midland region.

With regard to Ireland's aging population the RSES notes the importance all departments and sectors both public and private have in creating an age-friendly population noting:

"A good quality of life for older people are community-based and that all sectors – government, businesses, voluntary groups, service providers, local authorities and the public – have a role in creating an age-friendly society."

2.3 The Draft Wicklow County Development Plan 2021-2027

2.3.1 Community Development

The Draft Wicklow County Development Plan 2021-2027 (Draft Plan) in Chapter 7 'Community Development', specifically acknowledges the 'ageing' of the Irish population and the growing need for the provision of specific residential and day care facilities for the elderly. The Council *"recognises that the provision of residential / day-care and nursing homes are an essential community requirement, and that this area is underdeveloped in this County."* [Our emphasis]

The Draft Plan also acknowledges that *"Residential and day-care facilities can take many forms, ranging from day time activities / services to care / nursing homes, supported living facilities, assisted living units to independent (but supervised) living units and it is not therefore always possible to craft policies that will address all development types."*

The Draft Plan also aims to promote a sustainable community for all ages and is committed to *"support and facilitate the provision of supported housing for older people. This can enable people to live independently for longer and is an alternative housing options that falls somewhere between continuing to live in their own home independently and nursing home / residential care."*

Overall, the Draft Plan supports the establishment *"new or expansion of existing hospitals, nursing homes, centres or medical excellence, hospices, wellness / holistic health centres, respite care facilities for those with long-term illness"*

The Draft Plan also encourages independent living and supported housing for older people and people with disabilities to be located close to towns and villages noting *"this can enable people to live independently for longer and is an alternative housing option that falls somewhere between continuing to live in their own home independently and nursing home / residential care."*

The policies for Residential & Day Care are set out in Chapter 7 (page 165) as follows:

| Policy Ref | Policy Description |
|------------|---|
| CPO 7.22 | To facilitate the development and improvement of new and existing residential and day-care facilities throughout the County. |
| CPO 7.23 | To facilitate the development and improvement of new and existing supported living facilities throughout the County. |
| CPO 7.24 | Residential and day care facilities shall, in general, be required to locate in existing towns or villages where sustainable mobility is easily achieved, shall be located close to shops and other community facilities required by the occupants and shall be easily accessible to visitors, staff and servicing traffic. Locations outside of delineated settlement boundaries shall only be considered where: |

| Policy Ref | Policy Description |
|------------|--|
| | <ul style="list-style-type: none">• The site is located in close proximity to a settlement and would not comprise an isolated development.• An alternative site within the settlement boundary is not available.• There are excellent existing or potential to provide new vehicular and pedestrian linkages to settlement services.• The design and scale of the facility is reflective of the semi-rural location. |
| CPO 7.25 | 'Retirement villages', made up of a number of independent housing units, <u>with limited / no on-site care facilities</u> will be required to locate on residentially zoned land in settlements (or where no local area plan exists, within the defined boundary of the settlement). |
| CPO 7.276 | Clinically managed/supervised dwelling units, such as 'step down' (i.e. post-acute care) accommodation or semi-independent housing provided as part of a medical facility, nursing home or other care-related facilities, will be considered strictly only on the following basis: <ul style="list-style-type: none">• The units are associated with an already developed and established medical facility, nursing home or other care-related facilities; the units are held in single ownership with the overall medical / nursing home/care facility; no provision is made for future sale or subdivision; and a strict management agreement is put into place limiting the use of such structures to those deemed in need of medical supervision or care;• The number of such units on any such site shall be limited to 10% of the total number of hospital/ nursing/care home bedrooms unless a strong case, supported by evidence, can be made for additional units;• Such units shall be modest in scale and limited to single bedroom units only and independent facilities such as car parking and gardens shall not be provided to each unit (in order to ensure such units are not rendered suitable for standalone use as private dwellings). |

We would point out that developing residential accommodation for older people takes time, and this will require significant investment by the private sector; we therefore need to be planning and developing a range of facilities now.

2.3.1 Protected Structures

Chapter 8 of the Draft Plan addresses 'Built Heritage' and acknowledges that protecting Protected Structures is to find ways to protect their physical integrity and maintain their viability.

We note in particular CPO 8.14 *"To positively consider proposals to alter or change the use of protected structures so as to render them viable for modern use, subject to architectural heritage assessment and to demonstration by a suitably qualified Conservation Architect / or other relevant expertise that the structure, character, appearance and setting will not be adversely affected and suitable design, materials and construction methods will be utilised."*

This proactive policy is a pragmatic acknowledgement of the difficulties (financial and otherwise) associated with the upkeep of buildings of architectural heritage. The history of the adaptive re-use of Kilcrouney House over the last 120 years is testament of this (from house, to hotel, golf and sports club, retreat and school).

3.0 Retirement / Nursing Home Villages

The traditional model of care accommodation for the elderly is changing. As acknowledged in the Draft Plan they now take many forms, ranging from day time activities / services to care / nursing homes, supported living facilities, assisted living units to independent (but supervised) living units. The Draft Plan is also pragmatic enough to further acknowledge *"it is not therefore always possible to craft policies that will address all development types."*

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One model is the retirement / nursing village. Ideally this comprises:

- A range of step-down accommodation from independent living (with community, leisure and medical support available) to full time nursing home care for dependent residents.
- For more independent residents' convenient access to shops and other community facilities
- Easily accessible to visitors, staff and servicing traffic.
- A high-quality environment which can promote an active lifestyle and holistic approach to the health and wellbeing for the residents.

Our client(s) are vested in the well-being of our community (both now and into the future) and include an experienced developer who have successfully promoted and developed similar purpose built / nursing home village in Knightsbridge Village, Kells, Co Meath. Opened in 2008 the village provides 24-hour nursing care and independent living, in addition to Primary Care Services.

Key Points Arising:

- Building on the established institutional / school use, the subject lands in function, form and in terms of location (immediately adjacent to the settlement boundary of Bray) are highly suitable for use as a retirement / nursing village. Institutional residential use is established on site, other facilities can be adapted / incorporated into the village and the lands are suitably serviced. The adaptive reuse of the Protected Structure and its lands is considered sustainable.
- A retirement village is complimentary to the existing institutional use and will complement surrounding uses including the River Dargle Nursing home to the north of the site,
- The subject site is c. 2.5km from Bray and is easily accessible by bus. There are 2 no. bus stops to the north of the subject site serviced by Go-ahead bus routes 185 and 185-9 to Bray and Enniskerry. The proposed N11 upgrade works including junction upgrades is aimed to improve traffic flow within the area.
- As noted above, the subject lands are located within an area with a vast amount of open space. This provides opportunities for a high standard of landscaping and services for residents to avail of including walkways, a river walk, gardens and allotments.

3.0 Recommendation / Proposed Alteration:

With regard to the policy context above, it is requested a special policy objective be included in the Plan to acknowledge the long-established institutional use and infrastructure on site; and providing for a future retirement / nursing home village.

Building on the established institutional / school use, the subject lands in function, form and in terms of location (immediately adjacent to the settlement boundary of Bray) are highly suitable for use as a retirement / nursing village. Institutional residential use is established on site, other facilities can be adapted / incorporated into the village and the lands are suitably serviced. This has proven successful in other former religious / institutional uses including McAuley Place, Naas

Our client(s) are vested in the well-being of our community (both now and into the future) and include an experienced developer who have successfully promoted and developed similar purpose built / nursing home village in Knightsbridge Village, Kells, Co Meath. They are therefore ideally placed to re-envisage Kilcrouney House and grounds while developing much needed residential accommodation for older people in the Bray and north Wicklow area.

It is respectfully requested that the proposed amendment is taken on board in the final version of the *Wicklow County Development Plan 2021-2027*, and we look forward to the publication.

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Yours faithfully,
for RPS Group Limited

A handwritten signature in black ink that reads "Leah Kenny". The signature is written in a cursive, flowing style.

Leah Kenny
Director
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