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Date: 25th of May 2022

RE: Draft Wicklow County Development Plan 2022 - 2028

Site: Lands at Newtownmountkennedy, Co. Wicklow

Dear Sir / Madam,

CWPA Planning & Architecture has been retained by our client, First Step Homes First Step Homes, 13-14 Woodford Court, Santry, Dublin 17 to make a submission regarding the amendment to zoning as proposed in the Recommended Amendments document. We make this submission regarding Stage 5 of the process which requires submissions to be lodged before the deadline of 5pm on the 25th of May 2022.

The amendment is proposed specifically to impact on the site at Newtownmountkennedy that was recently the subject of a planning application, planning register number **22/259**. As this Application is still being processed within the planning system and is now the subject of an Appeal to *An Bord Pleanála* against the Decision of Wicklow County Council to refuse permission. We believe it would be premature to rezone the land from **RN** (New Residential) to **SLB** (Strategic Land Bank) prior to the determination of *An Bord Pleanála*.

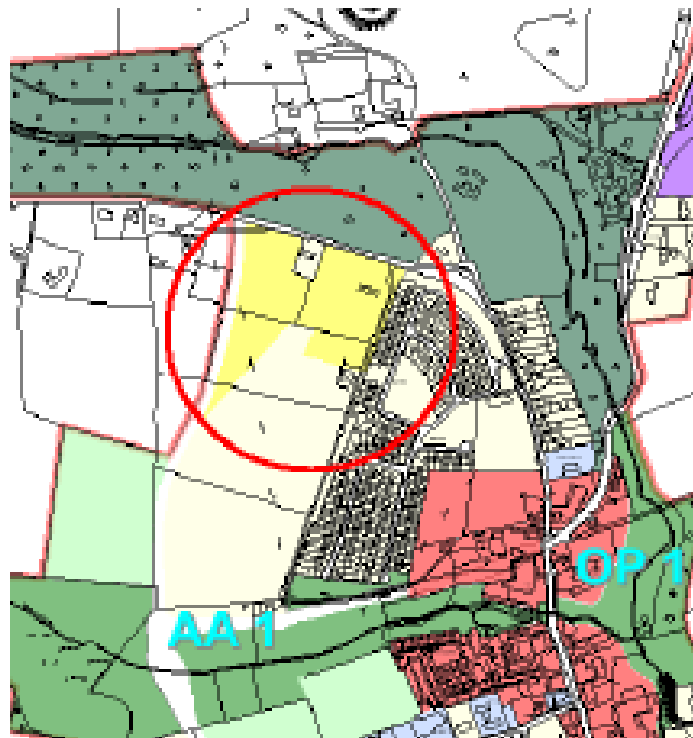
It is worth noting that the subject site is being proposed for residential development to include much needed Age Friendly housing for the community of Newtownmountkennedy and the development proposer is intending to develop the site immediately on receipt of planning permission. This is bolstered by the fact that First Step Homes have a reputation of delivering affordable, multifamily housing across Ireland. It is proposed that the site at Newtownmountkennedy will deliver affordable housing for the community and offer choice to older persons who wish to locate to an independent living development to retain links within their community. Of the 61 dwellings proposed, 17 are designed to Age Friendly standards for independent living, specifically for older residents.



It should also be noted that there is community infrastructure proposed as part of the overall development. This is in the form of a Community Day Centre to offer support to the residents of the development and the wider community. The overall development as proposed by its very nature and design, is a vital planning gain in terms of housing typology for the community.

The Amendment our client wishes to be removed is specifically Item 75 on Map 1, which states the following:

*Amend zoning of lands marked on map below **from** 'RN New Residential' **to** 'SLB – Strategic Land Bank'.*



Make any 'consequent' changes to text / maps associated with this zoning change

The land use zoning of Strategic Land Bank (SLB) states that:

These are lands that are identified as being potentially suitable for new residential development having regard to proximity and accessibility to infrastructure. However, these lands are not necessary for development during the lifetime of this plan and may only be considered for detailed zoning and development after 2028.

The following text is also proposed as part of the SLB zoning which states:

In order to ensure that the lands are retained for future development, no development proposals, including single housing, will be considered until after the lifetime of the plan.



We are cognisant of the recommendations in particular *Recommendation 5* from the Office of the Planning Regulator (OPR) in its submission to the Draft Plan. However, this site is to be developed out immediately after a Grant of planning permission. There is also the limit of 30% population growth to be considered. This population growth can be managed via the Development Management process within the Planning Authority where the caps can be controlled by the number of housing units allowed to be delivered within the lifetime of the Plan by the Planning Authority. It is also remarkable that the OPR in recommending a restriction on development land in the Newtownmountkennedy area but has not referred to existing government policy relating to housing provision for older persons and the objective of down-sizing or 'right-sizing'. Additionally, the absence of a mechanism whereby a structured approach to provision of affordable housing delivered in conjunction with the Local Authority, has not been proposed as a viable solution by the OPR as an alternative recommendation to downzoning of land.

It is notable the *Housing for All – A new Housing Plan for Ireland* document published by the Department of Housing, Local Government and Heritage states:

Under Housing for All, we will increase the housing options available to older people to facilitate ageing in place with dignity and independence, including policies and operational supports for older people considering right-sizing to smaller housing homes. We will be informed in this regard by the work of the national Implementation Group on the Housing Options for our Ageing Population Policy Statement⁷ and its reports.¹

Land that is seeking to deliver on government policy such as Age Friendly housing, should be given priority when land use zoning is being reviewed and revised. The site that is the subject of this submission is one such example where housing development is being delivered in compliance with government policy.

The proposed amendment to zoning on the subject site would serve to eliminate a development proposal that is ready to deliver affordable housing during what is an extreme housing shortage, primarily being experienced by young people wishing to purchase their own home. It also prevents those wishing to *Right-Size to Age Friendly Housing*, which only serves to ensure larger homes will not be released into the housing market for purchase by families with a housing need. By facilitating this in the new Plan, the planning authority is ensuring that no affordable housing or sustainable development as proposed will be delivered to those in most need. Particularly those who require immediate availability of affordable housing in Newtownmountkennedy and its environs.

To reiterate how damaging this change in zoning would be to a development such as the land that is the subject of this submission, we would reiterate that the SLB zoning objective is guaranteeing that no

¹ *Housing for All – A new Housing Plan for Ireland*, Chapter 2.4.1, Expand the Housing Options for Older Persons, pg 64.



development on this site will be facilitated until after 2028 and that it '...*may only be considered for detailed zoning and development.*...' after that date. This is an inordinate timescale to deprive the community of what is being offered as part of this proposal, affordable housing for young families, Age Friendly Housing for those wishing to Right Size and ancillary community infrastructure available to the wider community.

Therefore, on behalf of our client First Step Homes, we request that the proposed amendment be removed prior to the final adoption of the Wicklow Development Plan.

Yours sincerely,

A handwritten signature in black ink that reads "Joseph Corr".

Joseph Corr MPRII MIPI
Managing Director (Planning).