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

25th May 2022

Dear Sir/Madam,

RE: Irish Home Builders Association (IHBA) Submission to Proposed Amendments to the Wicklow County Development Plan 2022-2028.

Introduction

We, the Irish Home Builders Association (IHBA), a constituent association of the Construction Industry Federation (CIF), wish to make a submission in respect of the proposed amendments to the Wicklow County Development Plan 2022-2028.

The IHBA welcomes the opportunity to make a submission on the proposed amendments. The IHBA is broadly supportive of the content of the draft Plan and seeks to work constructively with the Planning Authority particularly in respect of the housing and development management aspects of the Plan.

The IHBA support the inclusion of appropriate policies and objectives which seek to facilitate the delivery of housing to meet targets for the county and to help address ongoing housing supply issues, in accordance with national policy.

Therefore, this submission focuses on a limited number of key amendments that will have significant implications for the delivery and cost of housing during the lifetime of the next Plan. Particular concern is raised in relation to the proposed amendment seeking to ban all PRS which would appear contrary to National Policy and the requirement for 10sq m private open space per bedroom for own door duplexes.



Submission to Proposed Amendments to the Wicklow County Development Plan 2022-2028

AMENDMENT V1 - 17

Section 6.4 Housing Objectives

General

CPO 6.1 New housing development shall be required to locate on suitably zoned or designated land in settlements and will only be considered in the open countryside when it is for the provision of a rural dwelling for those with a demonstrable housing social or economic need to live in the open countryside.

CPO 6.X The sale of all developments of residential units, whether houses, duplexes or apartments, to commercial institutional investment bodies shall be prohibited.

The inclusion of the Proposed Amendment V1-17 Objective CPO 6.X is contrary to the Apartment Design Guidelines and Government Policy as set out in Rebuilding Ireland and the IHBA recommends its deletion.

AMENDMENT V3 - 126

Section 3.1.4 Open space

- Within apartment developments, private and communal amenity space shall be provided in accordance Design Standards for new Apartments (DSFNA) (2018) **as amended and as may be amended in the future**. Care should be taken to ensure that such places receive adequate sunlight and meet the highest safety standards. The front wall of balconies should be made from opaque material and be at least 1m in height.
- Dwellings ~~(including own door duplexes)~~ shall generally be provided with private open space at the following **minimum** rates:

House size	Minimum private open space
1-2 bedrooms	50sqm
3+ bedrooms	60-75sqm

Own door duplexes shall generally be provided with private open space at a minimum rate of 10sqm per bedroom.

It will be expected that private open space provided will exceed these standards whenever possible and such minimum standards will only be acceptable for up to 50% of the units in any development.

A requirement for own door duplexes to have private open space of 10 sq m per bedroom will have negative and detrimental impact on duplex type development as a typology.

AMENDMENT V1-6 (Zoning)

While each LAP will cover a period of 6 years, zoning will be provided on the basis of the land needed to meet the 2031 population target, with clear objectives to ensure 2026 targets can be reached.

Core Strategy Table 3.7 to follow shows the housing unit requirements for the LAP towns, up to the year 2031 and the housing unit capacity of lands zoned in current LAPs.

This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA. Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) **shall be assessed against the population and housing targets set out in the Core Strategy of this County Development Plan** and the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.

~~Until such a time as new LAPs are adopted, the current plans for these towns are herewith subsumed into this County Development Plan.~~

The IHBA requests clarification as to the suitability of proposed amendment V1-6 as it will have a negative impact restricting development.

If it was considered beneficial, the IHBA would be happy to discuss the contents of this submission with the Planning Authority.

Yours faithfully,



Director Housing, Planning & Development Services