

Administrative Officer
Planning Department
Wicklow County Council
Station Road
Wicklow

25th May 2022

RE: PROPOSED AMENDMENTS TO WICKLOW COUNTY DEVELOPMENT PLAN (DRAFT) 2022-2028

Dear Sir or Madam

1.0 Background

We refer to your public notice inviting observations on the proposed amendments to the Draft Wicklow County Development Plan 2022-2028. The National Asset Management Agency (NAMA) wishes to take this opportunity to offer some comments on the proposed amendments. In doing so we are mindful that the final Plan will direct and lead proper planning and sustainable development in Wicklow County at a time of a severe housing shortage that needs to be addressed in early course.

NAMA holds security over a site at Kilgarron, Enniskerry that is zoned and serviced and currently the subject of a planning application which at the time of writing is under consideration by An Bord Pleanála. The site measures some 22 hectares and is located in Action Area 2 in the Enniskerry Local Area Plan.

2.0 Proposed Amendments to Core Strategy

Our submission relates to the proposed amendments to the Core Strategy Chapter, specifically Section 3.4 related to the revised population and housing allocations and to Section 3.5 related to zonings and the preparation of Local Area Plans.

While the population and housing allocations have issued from the Department of Housing, care needs to be taken in their absolute application vis-à-vis the consequences for land zonings. The allocations are based on an ESRI report that underpins the Housing Supply Targets (HSTs) issued by the Department of Housing. The ESRI report estimates an annual average requirement to provide 33,000 new homes nationally. This target has been shown to be conservative and indeed is much lower than estimates contained in reports prepared by other commentators including the Central Bank and indeed in earlier ESRI reports.

In order to understand the basis for the new housing targets, in 2021 NAMA commissioned Ronan Lyons Economist to review the assumptions/inputs used by the ESRI. The review suggests the assumptions used by the ESRI around fertility and mortality and international migration are conservative and as a result under-estimate overall housing need.

The review notes the CSO's population projections produced in 2016, estimated Ireland's population would grow to between 5.6m and 6.7m by 2051. Trends to 2020 suggest the population is tracking towards the higher end and is likely to reach 6.5m by the middle of the century. The Lyons report concludes that were more realistic assumptions to be used in the modelling, Ireland needs to build between 2.8m and 3.4m dwellings between 2016 and 2051, equivalent to between 38,000 and 61,000 per year.

In revising the core strategy, which will have a consequent impact on land zonings when the relevant LAPs are being prepared, consideration needs to be given to these findings and to avoid a scenario that serviced land is de-zoned in order to meet precision in targets, particularly where those targets are extremely conservative. To reduce the quantum of serviced land zonings would result in serviced land being unavailable for development. This is wasteful of costly infrastructure, will increase competition in the land market and is counterintuitive at a time of surging demand and chronic under-supply of housing.

It would also undermine parallel objectives of Government to dampen land prices. One of the objects of the Land Value Sharing And Urban Development Zone (UDZ) Bill 2021 is to cause a decrease in residential land prices. However, limiting the quantum of zoned land will serve to increase competition in the land market – the opposite of one the central aims of the 2021 Bill.

We would urge you therefore to treat the housing targets as a benchmark for monitoring to ensure compliance with national and regional figures, with the focus on identifying sites based on their characteristics and capability of supporting sustainable development rather than on meeting precise targets. In this way, the chronic shortage in housing can be addressed by providing choice in the land market while targeting serviced and sequentially located sites for development. This will ensure effective and sustainable growth.

3.0 Preparation of Local Area Plans

Proposed material amendment V1-6 relates to the issue of zoning in LAPs as follows.

*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.*

This proposed amendment entirely erodes the **statutory** process for the preparation of Local Area Plans which invites public participation around matters that are of relevance and interest to the communities that they are designed to serve, including land zonings. It sets aside the entire provisions of Section 19(1)(b) of the Planning and Development Act 2000 (as amended) and appears to apply a *first-up-best-dressed-approach* to development proposals. LAPs are drafted by Council officials and adopted by Elected Representatives after public discussion and debate. The above provision uses the County Plan to effectively de-zone lands in extant LAPs absent the required democratic process for their preparation. This goes to the heart of the Aarhus Convention and is legally flawed. We request that the text in red is removed in the adopted Plan.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Deirdre O'Connor". The signature is fluid and cursive, with the first name "Deirdre" and the last name "O'Connor" clearly distinguishable.

Deirdre O'Connor MIPI, MRTPI

Head of Planning

National Asset Management Agency

