

Draft County Development Plan
Forward Planning,
Wicklow County Council,
Station Road,
Wicklow Town,
A67 FW96

25th May 2022
Our Ref. 17166

Dear Sir or Madam,

RE: SUBMISSION ON THE DRAFT WICKLOW COUNTY DEVELOPMENT PLAN MATERIAL ALTERATIONS 2022-2028 ON BEHALF OF RONAN GROUP REAL ESTATE

1.0 INTRODUCTION

- 1.1. On behalf of our client, Ronan Group Real Estate (RGRE), Cooney Carey Consulting Ltd, Units 15/16, The Courtyard, Carmanhall Road, Sandyford, Dublin 18, we wish to make a submission in respect of the draft Wicklow County Development Plan 2022-2028 material alterations.
- 1.2. Our client's land interest within the County, includes Stylebawn in Delgany and St. Valery's in Fassaroe.
- 1.3. The proposed material alterations to the draft Development Plan Core Strategy will in effect substantially halt future residential development in the County beyond extant permissions during a housing crisis, one of the key issues facing the country. The Core Strategy will not assist in the housing crisis and will likely compound it.

2.0 COMMENTARY ON MATERIAL ALTERATIONS

- 2.1. We would make the following key points as part of this submission and respectfully request Wicklow County Council to fundamentally reconsider the Core Strategy:

Population Targets:

- The population targets in the National Planning Framework and Regional Strategy are based on outdated figures and an underestimate of population growth since the 2016 Census.

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- The CSO's own population estimates show a population increase of over 200,000 between 2017-2021 whereas the NPF targets a population increase of 1.1 million up to 2040, which appears to be a significant under estimate.
- Applying a similar growth to that in the CSO estimate of population would result in a population of c. 6.3 million whereas only 5.7 are projected in the ESRI information which informed the NPF.
- The restrictive growth being applied in the Core Strategy would therefore not allow for the likely more realistic growth in population being experienced
- The NPF states the figures on growth provided, are not precise figures, more an indication of a pattern of growth. As such there is flexibility in their application in our view.
- Population growth should be based on more up to date information as the outdated information utilised will result in the Core Strategy compounding the housing crisis.

Land Use Requirements for Residential Development

- The Core Strategy projects housing land requirements based on population growth (concerns with which are set out above) and identifies an over supply of residential zoned lands in the majority of settlements, including Greystones-Delgany.
- The Plan does not however in the identification of an oversupply, consider activation of permissions.
- It would not be realistic to assume that all of the zoned residential lands (to solely meet the projected population growth) would be delivered during the 6 year Development Plan lifecycle. Certain lands will have constraints which will result in them not being brought forward, or they will retain existing non residential uses.
- Additionally, current experience is that the planning process is taking longer with delays on decisions on appeals and legal challenges.
- An overprovision of zoned lands should be provided for to take into account that not all lands will be brought forward for development, allowing competition between sites.
- The restrictions on zoned lands will result in higher costs for housing as land values of zoned lands will increase. This is contrary to the ambitions of Housing for All, to make housing more affordable.
- The conversion of population growth to land requirement is based on a typical household size of 2.5; however, this does not account for the current overcrowding of residential units and a long term trend of a further reduction in household size. If this were taken into consideration, there would be further lands required to meet the population growth.
- The 2016 Census showed the average household size as 2.75, reversing a constant downward trend. The average household size in Wicklow was 2.86, higher than the national average indicative of overcrowding and younger persons being unable to move from their family home.

Implications on Local Area Plans

- Material Alteration V1-6 provides that the Core Strategy will be in effect on adoption of the next development plan and all applications will be assessed against this, notwithstanding the provisions of a Local Area Plan.
- This will effectively render the LAPs void with respect to residential development outside of any statutory process and not allow for the realisation of their objectives.

- It does not allow for any transitional period for developments in the pipeline on such lands.
 - Local Area Plans were prepared for towns where infrastructure should and has been targeted. To prevent residential development in these locations would not utilise infrastructure servicing these lands representing an underutilisation of public expenditure.
- 2.2. Our client requests that the Core Strategy is fundamentally revisited on the basis of the above. The Core Strategy is fully revised in the material alterations, and therefore this may be undertaken by way of modifications prior to adoption.
- 2.3. We would note that under Section 95 (1) of the Planning Act 2000 (as amended), planning authorities are obliged to:
- “ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy **and to ensure that a scarcity of such land does not occur at any time during the period of the development plan.**”*** (our emphasis added).
- 2.4. On the basis of the information contained herein, with population targets being underestimated, it is likely that the County will not provide for realistic growth and sufficient lands to meet the needs of the County.
- 2.5. The National Planning Framework sets out that the population and housing targets should not be viewed as a precise numbers, rather a pattern of development.
- “In setting overall targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers. From a long-term, national perspective, the targeted location, relative scale and proportionality of growth will assist in monitoring and assessing delivery and performance.*
- 2.6. Wicklow County Council may therefore revisit the population and housing growth targets on this basis and fulfil their obligations under the Planning Act.

3.0 SUGGESTED MODIFICATIONS AND CONCLUSIONS

- 3.1. In light of this submission, the following modifications are requested:
1. A fundamental reassessment of the population growth figures contained in the Draft Development Plan with associated modifications to the Development Plan Core Strategy.
 2. The provision of sufficient lands for residential development, to allow for an oversupply of lands in recognition that not all lands will be brought forward for development and associated modifications to the Development Plan Core Strategy.
 3. Modifications to Material Alteration V1-6 to allow for a transitional period and the implementation of the Local Area Plans. Suggested modification to the text is provided below:

*“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 provisions of the existing LAPs***

~~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”

- 3.2. Our client respectfully requests that this submission is taken into consideration in the finalisation of the next Wicklow County Development Plan.

Yours faithfully,



John Spain Associates