



10th January 2020

Forward Planning Section,
Planning and Environment,
Wicklow County Council,
County Buildings,
Wicklow Town

Re: Issues Booklet for the Wicklow County Development Plan 2021 – 2027

A chara

Thank you for your authority's work in preparing the *Wicklow County Development Plan 2021–2027, Issues Booklet*. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the review of the Wicklow County Development Plan.

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the *National Planning Framework* and the *Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031*;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some comments and observations for your authority to consider in formulating the draft development plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at draft and amended draft development plan stages.

Core Strategy & Settlement Strategy

The formulation of the core strategy in line with section 10 of the Act is the most significant element in developing your authority's draft development plan.

The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area are key determinants for the core strategy.

The NPF acknowledges that the strategic location of the county in close proximity to the capital city of Dublin has in part, resulted in significant development and high levels of population growth.

The NPF places emphasis on the following points in terms of managing the challenges of future growth:

'A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.'

The NPF also signals the Government's intention to secure more sustainable and compact urban development patterns into the future with specific targets for the delivery of new homes on infill and brownfield sites within urban areas.

As your authority will be aware, appendix B of the RSES sets out a projection of population for Wicklow, which ranges from 155,000 (low) – 157,500 (high) to 2026 and from 160,500 (low) – 164,000 (high) to 2031 and this projection is a key element for the formulation of the core strategy.

In addition, page 5 of the NPF Implementation Roadmap provides scope for headroom, not exceeding 25%, to be considered to 2026 for Wicklow where projected population growth is projected to be at or above the national average baseline.

As matters stand, the Office notes that Table 2.3 of the Wicklow County Development Plan 2016-2022 has a proposed population target of 167,000 to 2025 (derived from previous and now superseded Regional Planning Guidelines) which exceeds the high population projection for 2031 in the RSES.

Furthermore, the extant development plan's population target of 185,000 for 2031 is between 21,000-24,500 higher than the RSES and the NPF's county population projections of 160,500-164,000 to 2031.

Taking account of the above, a key issue in preparing the next Wicklow County Development Plan will be a recalibration to take on board newer strategic planning policies in relation to population change, employment and housing location, noting that the NPF does not provide for headroom beyond 2026 and putting in place coherent and realistic planning objectives across the settlement structure of the county.

The Office therefore agrees with the statement in the Issues Booklet that the current planning policy context *'...will require a change in our population growth strategy going forward...'* In this regard, the

Office notes that a number of rural Electoral Divisions in the county recorded population increases of over 25% during the 2006-2016 period.¹ In addition, some observations are set out below which may be of use to your authority in developing the next development plan's core strategy.

The Office welcomes the acknowledgement in the Issues Booklet that *'it will be necessary to alter the designation, place in the hierarchy and the development strategy for the previously designated 'growth towns' of Bray, Wicklow – Rathnew, Arklow, Greystones – Delgany, Newtownmountkennedy and Blessington to align with the new designations set out in the RSES'*.

The current Core Strategy contains six Principal Growth Towns, whereas the RSES identifies two locations in Wicklow namely Bray and Wicklow-Rathnew as Key Towns within the Metropolitan and Core Region area and settlement hierarchy respectively.

In preparing your authority's development plan, there is scope to prioritise the development of Wicklow-Rathnew and Bray to reflect their designations as Key Towns in RSES and capitalise on existing and planned investments in infrastructure.

Wicklow-Rathnew is a Key Town in the Core Region of the RSES and is important within a regional and county context. The RPOs for Wicklow support the development of the town as a hub for employment, training and education, film and tourism. Consistent with RSES, the development plan will need to prioritise the redevelopment of opportunity sites within the core areas in the first instance.

The Regional Policy Objectives (RPOs) for Bray acknowledge the potential for further growth in Bray supported by investment in employment and public transport in consultation with Dun Laoghaire Rathdown County Council. The RSES outlines the potential for consolidation and enhancement of the town centre and for significant local employment growth for both its residents and surrounding catchment.

Page 34 of the RSES sets out specific Growth Enablers for the Dublin Metropolitan Area (DMA) which includes Bray and Greystones with section 5.3 containing guiding principles for the growth of the DMA. Both settlements are also part of the Metropolitan Area Strategic Plan (MASP) in Chapter 5 of the RSES which sets out a strategy to achieve growth of 1.4 million people in Dublin City and suburbs and 1.65 million people in the DMA by 2031 through the delivery of large-scale strategic development areas.

In addition to wider RSES and NPF population projections, Section 5.7 on Housing Delivery (Page 113) of the RSES states:

'There is a further allowance of transition population targets in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP. This shall apply only to the three Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors.'

¹ Reference – RSES page 15, Fig 1.6 Population Change (%) 2006-2016

.....The determination of population targets for local authorities within the MASP in accordance with the NPF and this strategy, including the population targets for the City and the Metropolitan Key Towns, should be agreed in consultation with the MASP Implementation Group,...

The Office understands that the consultation referred to above is underway and that the Regional Assembly, working with all the relevant local authorities and the Department of Housing, Planning and Local Government will provide clarity on the appropriate adjustments of broad NPF and RSES population forecasts to take account of NPO 68.

Aside from the larger towns in Wicklow, smaller settlements such as Newtownmountkennedy, Aughrim and Roundwood recorded population increases well in excess of the figures for the county (4.2%) and nationally (3.8%) over the 2011-2016 census period, as well as those of Bray and Wicklow (without Rathnew).

If the development plan is to prioritise key towns and other locations that are strategic from a county perspective, it will be necessary to carefully manage the level of development land that may come forward in other more dispersed locations. In the current county development plan, some level 5 and 6 tier settlements indicate the following quanta of future theoretical development potential, which in many cases would be dependent on fresh investment in enabling infrastructure. For example:

- Ashford is a Level 5 Small Growth Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to more than double the settlement's population.
- Aughrim is a Level 5 Small Growth Town which recorded a significant population increase over the 2011-2016 census period. There appears to be sufficient lands zoned to increase the settlement's population by approximately 50%.
- Baltinglass is a Level 5 Small Growth Town and appears to have sufficient lands zoned to increase the settlement's population by approximately 60%.
- Carnew is a Level 5 Small Growth Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to almost double the settlement's population.
- Dunlavin is a Level 5 Small Growth Town where the population remained stagnant at 838 people over the 2011-2016 census period. However, there appears to be sufficient lands zoned to accommodate a further 2,000 people approximately.
- Tinahely is a Level 5 Small Growth Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement's population by approximately 70%.
- Avoca is a Level 6 Rural Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement's population by over 40%.
- Donard is a Level 6 Rural Town and appears to have sufficient lands zoned to increase the settlement's population by approximately 50%.
- Newcastle is a Level 6 Rural Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement's population by approximately 60%.

- Roundwood is a Level 6 Rural Town which recorded a significant population increase over the 2011-2016 census period. There appears to be sufficient lands zoned to increase the settlement's population by approximately 50%.
- Shillelagh is a Level 6 Rural Town which recorded a minor population decrease over the 2011-2016 census period. However, there appears to be sufficient lands zoned to increase the settlement's population by approximately 60%.

Therefore, based on the estimates provided in the Issues Booklet, there appears to be sufficient lands zoned in the above level 5 and 6 tier settlements to provide for approximately 3,750 residential units or an additional 10,500 people².

A critical issue for the forthcoming development plan will therefore be to consider how appropriate such development aspirations are, both in the context of prevailing trends over time in areas exhibiting a long-term pattern of population stability, as well as wider strategic development objectives and priorities and the requirements of the Act to include a Core Strategy that is consistent with national and regional planning policy requirements.

The Office also welcomes the acknowledgement that there will need to be a considerable shift from providing densities of between 10 and 28 units per hectare on greenfield sites and to new housing formats.

Having regard to the above, there would appear to be a need to review the extent and phasing of lands currently zoned for residential development in the lower tier settlements in the context of future need and available infrastructure to support future growth. This should also have regard to extant planning permissions and settlements with a prevalence of vacant units.

The Office notes that the Retail Hierarchy on page 18 of the Issues Booklet does not make a clear distinction between the Level 3 Town And / Or District Centres of Greystones, Arklow and Blessington which are at levels 3 and 4 of the Settlement Hierarchy and the Sub-County Town Centres (Key Service Centres) of Baltinglass, Rathdrum and Newtownmountkennedy which are Level 5 Small Growth Towns in the Settlement Hierarchy. Table 6.1 Retail Hierarchy for the Region of the RSES identifies Baltinglass, Rathdrum and Newtownmountkennedy as Key Service Centres rather than Town And / Or District Centres.

The Office will provide further practical advice and technical support in the working out of the core strategy parameters above and within our statutory remit as you may require.

Given the location of Bray on the administrative boundary with Dun Laoghaire Rathdown County Council and the timing for the preparation of the Dun Laoghaire Rathdown County Development Plan 2022-2028, the Office would like to highlight the provisions of section 9(4) of the Act, which states:

In making a development plan in accordance with this Chapter, a planning authority shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the planning authority considers it to be inappropriate or not feasible to do so.

² Based on the average occupancy rate of 2.8 persons per household in the region – reference, page 202 of RSES

Having regard to the above, engagement and co-ordination with the ongoing review of the Dun Laoghaire Rathdown County Development Plan would be essential and the Office would expect to see evidence of the above in the next stage of your development plan review process.

In summary, the Office advises that the preparation of the core strategy should have due regard to the settlement typology of towns in the region and carefully consider the zoning and phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy. See Tables 4.2 and 4.3 of the RSES for further guidance.

Rural Development Strategy

The Office acknowledges that the county is predominantly rural and that these rural areas face differing development issues and challenges, from areas that are broadly stable or partly declining in population to other rural areas closer to the metropolitan area that are under considerable pressure for piecemeal and un co-ordinated rural development.

In this regard the Office agrees with the statement in the Issues Booklet about the need to manage rural housing *‘...to protect the County’s scenic landscape and natural resources, to avoid urban generated housing and to ensure the needs of those with a bona fide necessity to live in the rural area are facilitated.’*

The Office understands that updated guidance on rural housing is in development by the Department of Housing, Planning and Local Government and in the meantime, your authority’s attention is drawn to National Policy Objective 19 and Circular letter PL 2/2017 from the Department of Housing, Planning, Community and local Government regarding Sustainable Rural Housing Guidelines for Planning Authorities 2005 and Local Needs Criteria in Development Plans.

The development plan is also an opportunity to bring forward measures aimed at revitalising underutilised parts of rural towns and villages, bringing life back in to their centres and offering an alternative to a proliferation of single houses in the countryside, which over time can undermine the vitality and viability of those towns and villages.

Economic Development & Employment

The RSES outlines the following for the Key Towns of Bray and Wicklow-Rathnew:

‘They are large economically active service and/or county towns, with high quality transport links that play an important service role for their catchments and that have the capacity to act as growth drivers to complement Dublin and the Regional Growth Centres.’

Development of planning policies and objectives consistent with the RPOs for the Key Towns of Bray and Wicklow-Rathnew and the MASP will be a key consideration in the planning for economic development of the county.

The Office notes the current development plan aims to increase the jobs ratio from 42% in 2011 to 60% in 2028 and considers that this should remain as a key consideration for the next development plan.

The Key Towns of Bray and Wicklow have a similar ratio of jobs to resident workers of 0.633 and 0.621 respectively and the RSES supports further employment growth which builds on their assets and infrastructure.

Greystones-Delgany is the second largest settlement in the county, however its ratio of jobs to resident workers of 0.321 is significantly lower than the other settlements at the upper tiers of the settlement hierarchy. The RSES supports further employment in Greystones which takes advantage of its location on the North-South corridor (DART) on the Dublin MASP. The next development plan provides an opportunity to address this imbalance consistent with the RSES.

The Office commends the council for its strategies to increase the jobs ratio in lower tier settlements such as Carnew and Dunlavin and advises that the zoning of land for residential in such settlements needs to carefully consider access to local employment in these settlements.

The Office recommends that economic development in settlements, particularly those settlements with good access to the M/N11 corridor, shall be prioritised in a sequential manner concentrating primarily on lands serviced and with a high standard of accessibility by public transport, foot and private car. This model of development will contribute to avoiding car-dependent economic development whilst ensuring that the carrying capacity and operational efficiency and national roads are safeguarded.

Transport & Infrastructure

The Issues Booklet acknowledges that public transport investment has not kept pace with population growth and this has reinforced well established car based commuting patterns.

In this regard, a key issue for the next development plan is to ensure that policies maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by further car based commuting.

The Issues Booklet recognises the role the development plan policy framework can play to encourage and facilitate sustainable transport. The Guiding Principles for Integration of Land Use and Transport under the RSES should inform the plan, as required by RPO 8.1 and RPO 8.4. Compliance with this approach may assist your authority's plan in meeting mandatory objective section 10(2)(n).

As outlined above, there is a need for an integrated approach to the planning and development of areas that straddle the administrative boundaries of Wicklow and Dun Laoghaire Rathdown which is evident in the *Bray and Environs Transport Study (April 2019)*. It is important that the forthcoming development plan fully reflect the recommendations and next steps outlined in the study.³

As your authority will be aware, a major opportunity is currently available to ensure alignment between planning and infrastructure whereby plans at local level may be supported by capital investment⁴ where aligned with the objectives and policies of the regional and national level plans. In this regard, a central element of the NPF relates to the renewal and consolidation of underutilised parts of cities, regional and rural towns and villages (NPO3c refers). These areas can avail of existing infrastructure,

³ Reference – page 13 of the North Bray and Environs Transport Study – April 2019

⁴ National Development Plan, 2018 - 2027

or enable the investment in infrastructure for sustainable urban and rural development. In this regard, any strategy for the prioritisation of provision of water / wastewater infrastructure should be based on the growth strategy objectives under the NPF and the RSES, as referred to above.

Tourism, recreation and amenities

The Office commends the council for highlighting the importance of its landscape, coastline, rights of way and cultural assets for both tourism and conservation and the role of the development plan in respect of promoting and protecting these assets.

As outlined in the Issues Booklet, the County attracts large numbers of both domestic and overseas visitors to attractions such as Glendalough. The Office considers that balancing the need to protect its natural assets in particular against pressures for growth will be an enduring issue for the plan given the proximity of the County's rural areas to the DMA which is forecast to grow to a population of 1.65 million by 2031.

Climate Action and Energy

Having regard to the *Climate Action Plan 2019* and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction of carbon emissions is a central planning policy issue to be addressed in the draft development plan.

The Office understands that forthcoming updates to the 'Section 28' Development Plan Guidelines will initiate a process of enhanced guidance for the preparation of plans. This will include guidance on the requirement under section 10(2)(n) of the Act to promote sustainable settlement and transportation strategies including measures to reduce energy demand and greenhouse gas emissions (in addition to adaptation to climate change), by virtue of the location, layout and design of new development.

Your authority will be aware that the Office's evaluation of the development plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) in its evaluations and assessments of development plans.

In this regard, the development plan should provide sufficient clarity and certainty in terms of the said measures in order to direct any future local area plans made consequent to the proposed development plan.

Similarly, the promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines 2006* and *Draft Wind Energy Development Guidelines 2019* will also be critical to ensure Ireland meets its national targets and commitments to increasing renewable energy supply and reductions greenhouse gas emissions.

Summary

The preparation of the Wicklow County Development Plan 2021-2027 is an opportunity to develop a new development strategy for a diverse, vibrant and strategically located county that will benefit from Government commitment to national and regional strategic planning and capital investment.

The Office looks forward to reviewing the draft development plan and is committed to continued positive engagement with Wicklow County Council in implementation of national and regional policies at county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,



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