

[REDACTED]

From: [REDACTED]
Sent: 10 January 2020 15:11
To: 'Stephanie Byrne'
Subject: RE: County Development Plan Review (Richmond Homes)

A Chara,

I wish to acknowledge, with thanks, receipt of your submission regarding the County Development Plan review.

Mise le meas,

[REDACTED]
Planning, Development and Environment.

From: Stephanie Byrne [REDACTED]
Sent: 10 January 2020 15:06
To: Planning - Plan Review
Subject: County Development Plan Review (Richmond Homes)

Dear Sir/ Madam,

Please find attached pre draft submission on the issues paper for the Wicklow County Development Plan Review 2021-2027 on behalf of our client Richmond Homes.

I would be grateful if you could confirm receipt.

Regards,

Stephanie Byrne, Senior Associate Director
John Spain Associates,
39 Fitzwilliam Place,
Dublin 2.
D02 ND61

[REDACTED]
web: www.isaplanning.ie



The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended recipient(s). This information may be subject to legal professional privilege, and copyright. If you are not an intended recipient of this email, you must not use, disclose, copy, distribute or retain this message or any part of it.

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

By email to: planreview@wicklowcoco.ie

10th January, 2020

Dear Sir/Madam,

**Re: Submission on Preparation of Draft Wicklow County Development Plan
2021-2027**

This submission is made on behalf of Richmond Homes in relation to preparation of the preparation of the Draft Wicklow County Development Plan 2021-2027.

Richmond Homes is actively engaged in development of housing projects in the greater Dublin area and welcome the preparation of the new County Development Plan.

This submission is in response to the issues papers and focuses primarily on population and household projection and related housing supply issues.

We note in particular that Council will be preparing a 'Housing Need Demand Assessment' as part of the preparation of the Plan. We also note that the updated Department Guidelines in respect of preparation of the land, including housing needs assessment preparation has not yet been published.

The issues are addressed in the framework set out by the National Planning Framework and also the recently adopted Regional Spatial and Economic Strategy (RSES) for the lands in the Midland and Eastern region. We note that this sets out population projection for each County, including Wicklow in appendix 2.

These are based on the National Planning Framework population projections which were prepared in 2017.

It is respectfully submitted that the County Development Plan needs to reflect the up to date position in relation to population growth and housing needs in 2020. Failure to do so would result in an exacerbation in the existing housing crisis in the County and in the region.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPI

Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MS:ERM MAT&CP Dip EIA Mgmt. MIPI,
Stephen Blair BA (Mod) MRUP MIPI MRTPI Mary Mac Mahon MSc TCF Pg Dip MSP Pg Dip Env Eng Dip Env Plg Law Dip Mgmt Dip EIA & SEA B Soc Sc MIPI

Senior Associate Director: Stephanie Byrne BA MRUP MIPI

Associate Director: Blaine Cregan B Eng BSc MSc

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.
Registered in Ireland No. 396306. Registered Office: 39, Fitzwilliam Place, Dublin 2. VAT No. IE 6416306U

It is respectfully submitted that it is particularly important to factor in the actual population growth rates which have occurred since the preparation of the national planning of the NPF. The NPF predicts that the population growth nationally will grow by 900,000 from 2016 at an average annual rate of c. 0.9%, however noting the higher level in migration, the framework sets out a target to accommodate a population increase of 1.1m by 2040 with an average growth rate of 0.96% p.a. over the 24 year period.

We note that the NPF states that progress towards these targets are subject to review in the course of the plan period. However, no review has been undertaken to date.

Recent population data as published therefore by the CSO since publication of the NPF, show a significantly higher level of inward migration and higher level of population growth than anticipated in the NPF.

The population and migration estimates published by the CSO in August 2018, show population increase from 4.792m in April 2017 to 4.857m in April 2018. Further figures released in August 2019 show a further increase in population from 4.857m in April 2018 to 4.921m in April 2019. This represents an annual rate of increase in recent years of approximately 1.3%, a combination of migration and national increase.

If this rate of increase is applied up to 2040, it will result in an increase in population nationally of 1.486m which is significantly greater than set out in the NPF (an additional 0.385m over the NPF higher figure).

While disaggregated figures are not available, it is likely that a high proportion of this population growth has taken place in the Greater Dublin Area. It is likely therefore that the figures set out in the Regional Spatial & Economic Strategy (RSES) are a further underestimate of actual population growth that is currently taking place and likely to continue for the foreseeable future.

It is respectfully submitted that it is vital that the preparation of the County Development Plan obtains accurate up to date data on current population and actual population growth and that the projected future housing needs are based on these current population growth levels, rather than the lower levels which have been predicted in preparation of the NPF and the RSES.

It is well established that population growth levels in recent years have not been adequately met by housing supply in recent years, leading to a national housing crisis as set out in "Rebuilding Ireland" and other key government documents which seek to address the housing crisis.

While some progress has been made in this regard, there remains a very significant gap between new housing construction levels and the need for new houses nationally and in the region.

There has been an accumulation of shortfalls in housing building up over the last 10 years or so, year on year.

While the number of residential units being completed yearly has rebounded to c. 21,500 units in 2019 (ESRI, 2019), this remains significantly less than the estimated equilibrium demand for housing in the State. Moreover, the current level of housing need and demand is not at equilibrium, being significantly augmented by the extremely low level of housing completions in the decade since 2010. Over this period, a significant shortfall in housing has

amassed year on year, which is reflected in the data collected in Census 2016 – which revealed overcrowding and increasing numbers of households living in cramped conditions.

Therefore, it is essential that in assessing housing need requirements, that the existing shortfall in housing provision for Co. Wicklow is recognised and addressed upfront. Failure to do so will simply build in a continuation of an existing housing crisis for the next planned period.

Further evidence of this shortfall of housing provision on the existing population can be seen in the CSO publication “Census of Population 2016 – Profile 1 Housing in Ireland”. Whilst this was the position as of more than 3 years ago (2016), it already demonstrates problems arising from the shortfall in housing provision by that date, which has been exacerbated since.

Census 2016 revealed an increase in the national housing stock of just 8,800 units during the five year intercensal period (taking into account obsolescence) representing an increase of just 0.4 percent (as shown in figure 2, below).

This is particularly stark given the increase in population seen concurrently (173,613 or 3.8%). Furthermore, almost 40% of these additional units were one off houses, the majority of which would never have come to market. Census 2016 also revealed a surprising rise in the average household size (from 2.73 to 2.75) (CSO, 2017). This was attributed to household formation falling behind population growth, another probable symptom of lacking housing availability and increasing housing need.

This is clearly shown in the figures for average household size. The 2016 census identified for the first time since at least the 1960’s, an increase in average household size. The CSO housing profile document clearly shows a continuous downward trend in average household size from 4 persons per household in 1966 up to 2011 when it stood at 2.66. For the first time in 2016, this was reversed with an increase in average household size.

The CSO document also demonstrates that *“the slow down in housing stock growth can also be observed when analysing the year of construction among occupied dwellings”*. Thus, only 2% of dwellings nationally were built since 2011 and of these, almost half were in rural areas in the form of one-off houses. Therefore, the provision of new houses in towns is even further behind requirements arising from population growth

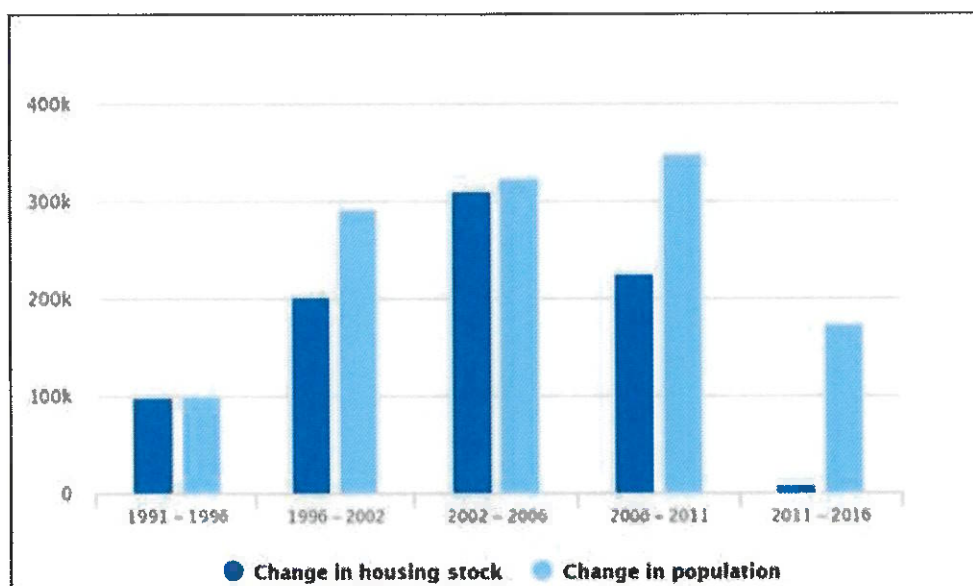


Figure 2: Changes in population and housing stock for Ireland, 1991-2016 (data from the Central Statistics Office, 2017)

This is evidenced by the fact that the average household size has risen much more quickly as increase in average household size has occurred in urban areas, rather than rural areas according to CSO data. Average household size is also higher in Counties such as Fingal, Meath, Kildare and South Dublin, with more than 3 persons per household compared with 2.73 nationally. In Wicklow the figure was 2.86, again higher than the national average.

The CSO states that *“the growth in household size is confined to urban areas”*. This increase in average household size is a result of shortfall in new housing provision, resulting in *“crowding”* in urban areas. This is again set out clearly in the CSO document by initial analysis of homes with more persons than rooms.

There was a 28% rise from 2011 to 2016 in the number of households with more persons than rooms. It states that this is a measure of the level of *“crowding”* within households.

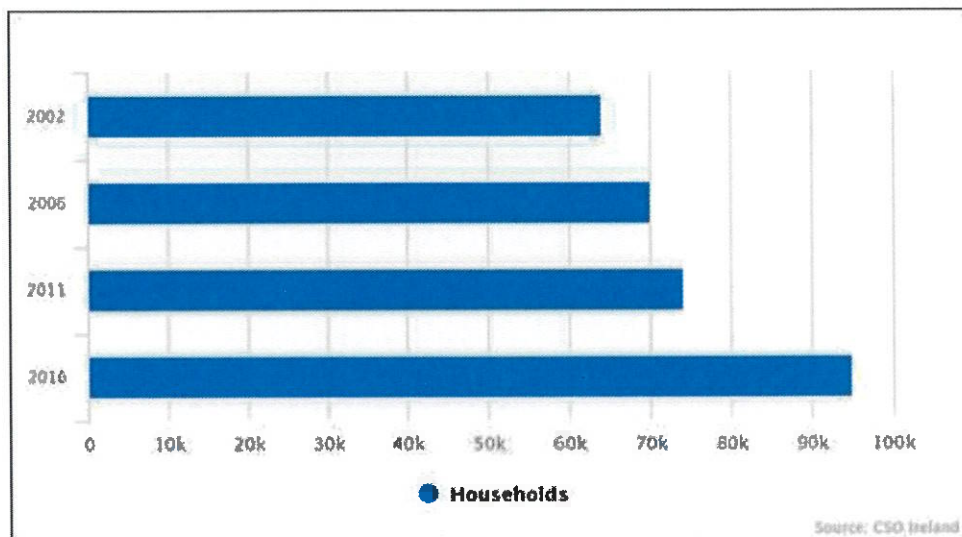


Figure 3: Number of households with more persons than rooms (data from the Central Statistics Office, 2017)

Therefore, all statistical evidence available points to the housing crisis resulting in *“crowding”* within existing houses in urban areas and an undesirable trend of increased household size forced upon people, arising from the significant shortfall in the provision of new housing.

Clearly there is a need to address this in the first instance and there is a need for a significant amount of *“catchup”* housing to meet the needs of existing population. This *“catchup”* housing must be provided for in the new County Development Plan, prior to providing for the requirement of future population growth in the County.

The approach taken to date in preparation of the Development Plan is to link housing need over the plan period solely to forecast population growth. This is clearly no longer a valid approach.

The Central Bank of Ireland has published a study entitled 'Population Change and Housing Demand in Ireland'¹, which includes the following key points:

- *"Growth in population has significantly exceeded the increase in the housing stock since 2011 and the average household size has risen, reversing a previous long-running trend.*
- *To keep pace with population growth and changes in household formation, our estimates indicate that an average of around 27,000 dwellings would have been required per annum between 2011 and 2019.*
- *Assuming unchanged household formation patterns and net inward migration close to current levels, around 34,000 new dwellings would be required each year until 2030."*

There is now a need for a two-fold approach, firstly to set out the housing need to meet the deficit of housing for the existing population and then to add to that, the additional housing needs for projected population growth. This results in significantly increased level of housing need over and above that based on the traditional population growth basis only.

Again, failure to make this provision in the housing need assessment requirement for the County, will result in exacerbation of the current housing crisis and its continuation for the planned period.

Density and Housing Mix

The Council will be very aware of the significant increase in housing densities which are required under National Planning Policy compared with those previously obtained in housing development in the County.

In addition to this policy requirement, there is a requirement for a greater mix of housing types with a particular emphasis on inclusion of apartment development in all significant housing schemes in urban areas.

However, it is respectfully submitted that this policy does not sufficiently differentiate between the housing need requirements, and indeed demand and viability of housing development, in different parts of the country and in different parts of Counties such as Wicklow.

There is a very significant difference between the requirements and viability of development of different forms of housing in Dublin and those areas of Wicklow which are within the Metropolitan Area and those which are outside the defined Metropolitan Area. There are also significant variations within the Metropolitan Area.

From our experience from working extensively with developers involved in housing development throughout the country, it is quite clear that the development of apartment schemes is only viable from certain parts of the larger urban areas such as those which are well served by high quality public transport.

It is respectfully submitted that the County Development Plan should reflect these differentials in housing demand and viability.

There is a growing concern that the policies requiring development of a wider range of housing types, including apartments in all locations, will result in the significant reduction in

¹ Available at: <https://www.centralbank.ie/news-media/press-releases/press-release-economic-letter-population-change-and-housing-demand-in-ireland-10-december-2019>

housing unit provision in areas outside of main urban centres and outside metropolitan Dublin, as a result of non-viability of delivery of apartments in these areas.

This lack of viability arises significantly from the simple equation of the sale price achievable, falling well below construction costs of apartments outside the Metropolitan area in particular, and indeed in many parts of Metropolitan Dublin. This is the case even at a time of significant shortfall in housing and following a period of sustained house price increases.

Whilst the objectives of a more compact urban form and more sustainable forms of development in this respect are recognised, there are other ways in which this can be achieved, which are not yet reflected in government policy. For example, new forms of development of houses (rather than apartments or duplex) have emerged elsewhere, which deliver greater levels of density. This however requires changes to standards set out in National Policy and Development Plans in relation for example, minimum size of rear gardens and separation distances.

We respectfully request in preparation of the County Development Plan, that the County Council undertakes a study of this critical issue and incorporates a greater flexibility on standards for development of houses in this respect, especially where a high quality design has been demonstrated.

This emerging new approach to housing design and standards has significant potential to help deliver on housing need in a sustainable manner in the county.

Headroom

The County Council will be aware that in identifying land requirements for housing, the well established approach to this as set out in the guidelines, is to allow an element of headroom of the order of 50% of land requirement, to reflect lands which are zoned and which may not come forward for development during the plan, having regard to constraints such as infrastructure, services and the unwillingness of some landowners to bring forward their land for development. This has proved to be an essential part of ensuring adequate land supply and it is respectfully submitted that this approach should be continued in preparation of the new County Development Plan.

There are some suggestions in the Implementation Roadmap for the NPF and other documents, that it is not necessary to provide for the same level of headroom in the future, having regard to the uplift in population projections incorporated in the NPF.

However, CSO data has now demonstrated that these uplifted population projection figures in themselves, underestimate the level of population growth currently taking place and therefore, the need or headroom is actually even greater than previous and not less as anticipated by the NPF Implementation Roadmap.

In this respect, it is acknowledged that the NPF and RSES requires a more detailed assessment of the suitability of potentially zoned land for development, including availability to infrastructure and services. However, it is recognised that it would take some time to comprehensively assess all lands in respect of these matters in preparation of the new County Development Plan timescale and it is difficult to accurately assess likely delivery levels.

Therefore, there is a need to maintain headroom levels of 50% or greater in the zoning of housing lands.

We would be happy to elaborate further on these issues if that would be of assistance.

Yours faithfully,

John Spain Assoc.

**John Spain
Managing Director**