

[REDACTED]

From: [REDACTED]
Sent: 10 January 2020 16:29
To: 'Emma Flanagan'
Subject: RE: Wicklow County Development Plan Review - Submission

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: Emma Flanagan [REDACTED]
Sent: 10 January 2020 15:33
To: Planning - Plan Review
Subject: Wicklow County Development Plan Review - Submission

To whom it may concern,

Please find attached submission on the Wicklow County Development Plan review on behalf of Cairn Homes.

Regards

Emma

Emma Flanagan
Town Planner



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10th January 2020

To whom it may concern,

RE: WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027

Cairn Homes welcome the review of the current Wicklow County Development 2015-2021 and the opportunity to make a submission in respect of the new County Development Plan. There have been significant changes in national planning policy over the lifetime of the existing development plan and the review offers an opportunity to align the emerging development plan with these and ensure Wicklow is in a position to respond to the challenges ahead.

Cairn Homes have delivered circa 250 new homes over a 3 year period in Greystones, Co Wicklow, and have sought planning permission for an additional 780 new homes over two sites also in Greystones. In addition, Cairn Homes own additional land in Greystones, Blessington and Enniskerry with capacity to deliver c. 1,200 new homes over the lifetime of the new County Development Plan. Cairn is committed to working with Wicklow County Council in the delivery of these much-needed new homes together with the associated infrastructure necessary to deliver new communities with improved and high-quality amenities.

It is in the context of these potential developments that this submission is made with its focus on the towns of Greystones, Blessington and Enniskerry and policies related to the delivery of housing and supporting infrastructure. It is recognised that submissions in relation to zoning cannot be made at this time and therefore this submission focuses on the more strategic policies contained within the development plan.

The Core Strategy and the Settlement Hierarchy:

The core strategy and settlement hierarchy are the central elements of the development plan, guiding development within the county and underpinning many of the policies and objectives. The core strategy and settlement hierarchy are required to align with the relevant national and regional policies. Since the existing Development Plan was adopted new Regional Planning Guidelines have been prepared for the enlarged Eastern and Midlands region (EMRA). The new Regional Spatial and Economic Strategy of the Eastern and Midlands Region (RSES) contains a less prescriptive settlement hierarchy than that formally contained within the Regional Planning Guidelines for the Greater Dublin Area. The RSES has designated Bray and Wicklow as Key Towns but has left the settlement hierarchy of towns beneath this level to the discretion of the local authority to determine.

The Issues Paper has posed some interesting questions in this light and Cairn responds to each in turn

1. What is the best designation for your town?

Under the existing settlement hierarchy Greystones, Blessington and Enniskerry status are as follows:

Level	Description	Definition	Town
3	Large Growth Town II	Smaller in scale but strong active growth towns, economically vibrant with high quality transport links to larger towns/city	Greystones-Delgany
4	Moderate Growth Town	In Hinterland areas, 10k from large town on public transport corridor, serve rural hinterland as market town	Blessington
5	Small Growth Town	Good bus or rail links; 10k from large growth towns.	Enniskerry

Cairn Homes would propose the following settlement hierarchy, which is consistent with existing hierarchy and reflective of each town’s position within Wicklow and the EMRA. An expanded justification for this hierarchy is also set out below.

Settlement Typology	Description	Town
Self-Sustaining Growth Towns	Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.	Greystones – Delgany
Self-Sustaining Towns	Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.	Blessington
Towns and Villages	Towns and villages with local service and employment functions.	Enniskerry

Greystones:

Cairn are conscious that a large proportion of the Greystones working population travel outside the town for employment. Given its location and good public transport links to Dublin, a significant number of people commute to the capital on a daily basis. Whilst it is located within the boundary of the Metropolitan Area as defined by the RSES, Cairn feel that there is potential for it to meet the needs of residents through the provision of a wider range of services and employment opportunities within the town. In addition to the significant number of new homes that Cairn can deliver in Co Wicklow, they also own 6.6 Ha of employment zoned land in Charlesland, Greystones. This land has the potential to deliver significant employment

opportunities for new and existing communities in the wider Greystones area. Cairn have estimated these lands could accommodate c. 1,500 jobs in Greystones. In this regard it should be noted that Cairn have applied for planning permission for a 1,356 sq.m Community Enterprise Centre and 1,376 sqm Office building as part of a SHD application to An Bord Pleanála which is currently under consideration. If granted planning permission, the proposal has the potential to create a valuable resource for small local start-up companies and industries which we anticipate will stimulate much larger employment opportunities for the wider community. Such developments, together investment and improvements to both the N11 and Dart will further enhance Greystones and create an attractive place not only to live but to work also which would represent a much more sustainable community and efficient use of public infrastructure. Greystones therefore meets the definition of “*Self-Sustaining Growth Towns*”.

Blessington:

Blessington is located on the Wicklow – Kildare border within the Core Region as defined by the RSES and currently acts largely as a commuter town for employment centres elsewhere in Wicklow, along with Naas and Dublin. The town provides a range of local services but is reliant on larger towns for some services. With the current Wastewater Treatment Plan at capacity for some time, development in the town has been significantly restricted to the detriment of the existing local community. With planning permission in place for the upgrade there is a significant opportunity to deliver new development in the form of new communities with improved infrastructure and access to employment. Cairn land equates to c. 64Ha at Blessington Demesne and includes zonings for Residential, Employment, Amenity, Community & Education and Agriculture. Therefore, given the mix of uses that can be accommodated on Cairn land, there is potential to deliver a self-sustaining community on the Cairn land within the lifetime of the new Plan. Blessington would appear to meet the definition of “*Self - Sustaining Town*”.

Enniskerry:

Enniskerry is a small town of less than 2,000 people according to the 2016 Census, located on the edge of Dublin and Bray. Enniskerry has a strong character and retained a largely intact and vibrant village centre which provide local services for residents. Cairn have the capacity to deliver additional new homes and associated infrastructure to the south of the village and improve the vitality of the village over the lifetime of the new Plan. Enniskerry would appear to meet the definition for “*Towns and Villages*” the lowest level of settlement before “*Rural*”. This is consistent with its position in the existing development plan.

2. What towns and villages should be promoted for population growth?

In line with the above set out hierarchy, Cairn believe that Greystones and Blessington should be promoted for population growth. Greystones, in particular, given its location along the Dart Line, proximity to Dublin and availability of services should be targeted for population growth in line with the policies of the National Planning Framework and RSES. The NPF encourages the concentration of development along public transport corridors, particularly rail corridors, and the consolidation of development within the metropolitan area.

Given the moratorium on development in Blessington until the WWTP was upgraded (now permitted) Cairn believe that the development of Blessington should be actively encouraged to address current pent up demand that has accrued from the lack of residential development over the past c. 10 – 15 years. The impact of this is evident in the population growth in the town. Between 2011 and 2016 the population of Blessington only increased by c.740 based on census figures. The current population target in the existing development plan is 6,540 by 2022 and 7,500 by 2028. Blessington it would appear has historically

underperformed in contributing to meeting housing need in Wicklow, but with the upgrading of the WWTP it should not only meet these targets but have capacity to support additional population growth.

The majority of population growth nationally is expected to occur with the Greater Dublin Area (GDA). There is an onus on the GDA planning authorities to ensure they maintain, facilitate and maximising the development yield from lands currently zoned and where necessary zone additional lands in line with the methodology set out in Appendix 3 of the NPF in order to meet the expected growth requirements. Towns such as Greystones and Blessington have a key role to play in this regard.

3. Do you think your town has the capacity to sustain more housing growth?

All the towns discussed have the capacity to sustain new housing developments, however some investment and improvements to infrastructure within the towns may be required to facilitate such development and enhance their desirability as places to live. These include investment in transport, wastewater infrastructure, and green infrastructure.

Transport:

Proposed upgrades to the N11 from Junction 4 to Junction 14 have recently been placed on public display and it is understood this project will likely progress, subject to planning, during the lifetime of the next development plan. These proposed upgrade works are welcome and will address the significant traffic delays experienced along the N11 particularly at peak times. However, there is also a requirement to improve public transport connections within Wicklow to help encourage more sustainable modes of transport.

While Greystones benefits from its location along the Dart line, the rail line remains a single line into Greystones which limits capacity on the line. Cairn is aware that the upgrading of the rail line has long been an objective of both CIE and Wicklow County Council. We trust Wicklow will continue to pursue the upgrading of the train line with a view to increasing capacity for Greystones and other towns in Wicklow located along this vital rail corridor. The park and ride facility at Greystones is also at capacity and we would suggest that consideration should be given to enhancing the park and ride facilities in Greystones.

Interconnectivity between different forms of public transport, and modal choice is essential in encouraging more sustainable modes of transport. Wicklow generally is underserved by bus services. Greystones is served by two bus routes; 84A which runs approx. once an hour and 84X and express service which runs at peak times to Dublin. A more frequent service which connects which Greystones and Bray rail stations would greatly improve connectivity in Greystones. Blessington is served by one bus route to Dublin which generally runs every two hours except at peak times. There is no bus route to Naas despite the proximity of the two towns. Enniskerry is similarly underserved with only one bus route which runs once an hour. All the towns would greatly benefit from improved bus services within the towns and to connect to other nearby large towns. We are aware public transport is outside the remit of Wicklow County Council but would encourage the Council to work with TII to improve services to these towns.

Green Infrastructure:

Public amenities and investment in green infrastructure can greatly enhance the amenity and quality of life within towns. In Greystones, Wicklow County Council have developed the first phase of a greenway which will eventually connect Greystones and Delgany. Cairn hope to deliver the second phase of this greenway as part of the proposed development at Farrankelly which is currently under consideration by An Bord

Pleanala. The greenway is a fabulous amenity for Greystones, and something which could be replicated throughout the county. We would encourage Wicklow to explore the potential for similar amenities in other towns such as Blessington where an opportunity exists to connect natural assets such as the Blessington Lakes and Glen Ding Woods. In Enniskerry there may be opportunities to provide connections with the Powerscourt Estate.

Wastewater Infrastructure:

As mentioned above the Blessington Wastewater Treatment Plant has been at capacity for some time, which has curtailed development in the town. Planning permission has recently been granted to upgrade the treatment plant which will facilitate new development. Cairn request that the upgrade of this facility is prioritised in order to stimulate new development. It is essential the infrastructural deficits do not delay or curtail development of much needed new housing.

4. How should we deliver compact growth in each of the County's towns and villages?

This matter shall be discussed in more detail in response to the issue of Housing. However, Cairn would note that density ranges in Wicklow are generally quite low and not in line with national guidance. In our experience there is also a reluctance to permit multi-family unit typologies such as duplex units and apartments outside of the immediate town centre. A review of the density ranges in Wicklow and policies surrounding typology would help deliver more compact growth in line with national and regional policy.

Housing:

The latest figures from Central Bank indicate 34,000 new homes must be built every year to 2030 in order to meet demand. The majority of these will be required in the GDA. Wicklow's housing strategy will be critical in helping to meet this demand. In this regard the Issues Paper poses several questions which we will respond to:

1. What types of houses are required to meet housing demand?
2. Is there a need for a special type of housing in your area e.g. the elderly, those with special needs?
3. Where and how should social housing be provided?
4. How can increased densities be achieved in Wicklow's towns and villages?
5. Where can high density development be accommodated?

1. What types of houses are required to meet housing demand?

The size and nature of families in Ireland is changing, and this in turn will influence future housing needs. There is a growing requirement for a greater variety of housing types to mix the changing needs of society with a greater requirement for smaller units and apartments. According to the 2016 Census 89.9% of housing in Wicklow is traditional housing, while only 6.8% are apartments or similar. Greater diversity is therefore clearly needed in Wicklow's housing stock. Additionally, the move in national policy towards consolidation of the urban area requires use of a wider variety of housing typologies.

Notwithstanding the above, Cairn would advocate that the emerging Development Plan should not explicitly state a requirement for specific unit mixes, and if one is included, that it is evidence based and allows for flexibility to respond to changing societal and market demands. This is in accordance with SPPR 1 of the Sustainable Urban Housing: Design Standards for New Apartments 2018. Additionally, Cairn would suggest that Policy HD15 which requires the inclusion bungalows in developments be removed, and Policy HD13 which stipulates apartments should not be permitted outside of town centre locations. Instead these

policies should be replaced by a policy advocating a mix of unit types on sites to meet housing needs. This will allow flexibility for both the Council and developers to respond to the changing needs of society and for a case by case determination on the appropriate mix on a site subject to wider considerations.

2. *Is there a need for a special type of housing in your area e.g. the elderly, those with special needs?*

Determination of the housing needs of specific demographics within the county is a matter for the Council, and Cairn look forward to working with the Council's Housing Dept were required to help meet these needs as appropriate. Cairn would encourage the Council to take a flexible approach in considering how these needs can met, including consideration of a variety of typologies such as duplex units and apartments. The ground floor units of duplex units and apartments which benefit from lifts may better meet the housing needs of specific groups such as the elderly or those with special needs compared to traditional housing. In new developments where a specific housing need is identified early, these units can be carefully designed in consultation with the Council and Approved Housing Bodies to ensure they meet the requirements of these groups.

3. *Where and how should social housing be provided?*

Cairn have successfully worked with Wicklow County Council on the delivery of social housing units on all their housing schemes within the county to date and have the capacity to contribute significantly to the delivery of social housing units within Wicklow going forward. The changes in society which are contributing to shifts in the market demand for less traditional housing typologies, are also evident in the needs for social housing with increasing requirements for 1 and 2 bed units compared to 3 and 4 bed units. Cairn would encourage the Council in their preparation of the Housing Needs Assessment to accompany the draft development plan to consider a variety of typologies for meeting future social housing need.

4. *How can increased densities be achieved in Wicklow's towns and villages?*

The densities in Wicklow, in general, are significantly below national standards and indeed the densities applied in neighbouring counties such as Kildare and Dublin. Alignment of the density standards in Wicklow with the Sustainable Residential Developments in Urban Areas Guidelines, May 2009 would increase the densities achieved in Wicklow's towns and villages without a significant change in the character of the areas.

In accordance with the Sustainable Residential Developments in Urban Areas Guidelines, Cairn would advocate the following densities:

- Town Centre and Public Transport Corridors: 50 units per hectare
- Outer Suburban and Greenfield sites: 35 – 50 units per hectare
- Small towns and villages: 20 – 35 units per hectare

In general, Cairn would advocate a target density range of 35-50 units per hectare on all residential land, particularly within the main towns such as Greystones and Blessington. In smaller settlements however such as Enniskerry a lower density of 20 – 35 uph may be more appropriate based on the character of such towns and the availability of infrastructure and services.

Where appropriate densities outside these ranges should be permitted where specific site constraints may prevent achieving the stipulated density or to allow appropriate design responses to the surrounding area.

5. Where can high density development be accommodated?

In accordance with the Sustainable Urban Design Guidelines, higher densities of 50+ units per hectare should be accommodated on sites in close proximity to high frequency public transport, such as the Dart or on town centre sites which benefit from easy access to services.

Economic Development & Employment

For the most part Cairn is focused on the delivery of new homes. However, in both Greystones and Blessington, Cairn own land which is currently designated for commercial and employment uses. Cairn recognises the importance and benefit of facilitating employment opportunities in close proximity to new residential developments and have included approx. 2,600 sq.m at Charlesland, Greystones as part of the live planning application.

The nature of the Irish economy has changed dramatically in recent years and will likely continue to evolve over the lifetime of the new development plan. There has been a move away from industrial and manufacturing uses which required large units, towards a service economy based in open plan offices. Office based uses have a much higher jobs yield per sq.m of commercial floorspace than industrial or manufacturing uses. This may reduce the requirement for the quantum commercial or industrial zoned land, particularly in peripheral locations. As mentioned above Cairn own 6.6 ha of commercially zoned land at Charlesland, Greystones. As part of the current planning application, Cairn undertook research into the changing needs of industries and potential employment generated per sq.m. This highlighted a potential need for Wicklow County Council to review the economic policies contained within the development plan to ensure they support the move towards office-based employment and are sufficiently flexible to accommodate a rapidly changing economy.

For example, in Greystones there is an objective to accommodate 660 jobs on the 6.6 ha of commercial zoned land owned by Cairn. Based on a plot ratio of 0.5, it is estimated the site would yield approx. 33,000 sq.m of commercial floorspace. This equates to an employment density of 50 sq.m per employee. This density would normally be associated with manufacturing and warehouse uses. In contrast office based uses generally require 12 – 30 sq.m per employee, based on Home & Communities Agency (2015) Employment Density Guide. In Greystones, we estimated the 6.6ha of commercially zoned land would accommodate circa 1,500 jobs between both office and warehouse based uses. This yield far exceeds the employment target for the site in the current development plan.

Consideration should be given to the requirements of different industries; the types of employment and the number of jobs Wicklow can reasonably support in the development of these policies. Policies and zonings may need to be reviewed to ensure targets and yields are realistic.

Conclusion:

Cairn welcome and support the review of the Wicklow County Development Plan. Cairn is uniquely positioned to deliver a significant number of new homes and communities in Wicklow during the lifetime of the emerging plan. The alignment of the emerging development plan with national policy, particularly around the areas of density and unit mix, is essential and will greatly assist Cairn in the delivery of these new homes. Flexible policies will be key to allow both Wicklow County Council and Cairn to respond to changing societal and market demands.

Cairn look forward to further engagement with Wicklow County Council on the emerging development plan.

Yours Sincerely



Emma Flanagan MRTPI MIPI
Town Planner – Cairn Homes