

[REDACTED]

Sent: 10 January 2020 15:09
To: 'Stephanie Byrne'
Subject: RE: County Development Plan Review

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 15:04
To: Planning - Plan Review
Subject: County Development Plan Review

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 Paul Stanton.

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.jsaplanning.ie



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

By email to: planreview@wicklowcoco.ie

Date: 10th January 2020

Dear Sir / Madam,

RE: COUNTY DEVELOPMENT PLAN REVIEW

**PRE DRAFT SUBMISSION ON THE PREPARATION OF THE WICKLOW
COUNTY DEVELOPMENT PLAN 2021-2027**

1.0 INTRODUCTION

- 1.1. On behalf of our client, Paul Stanton, 124 Lower Baggott Street, Dublin 2, we wish to make a submission on the pre-draft Issues Paper for Wicklow County Development Plan 2021-2027. Submissions are welcome by Wicklow County Council up until 10th January 2020.
- 1.2. The issues paper sets out the key information to inform the consultation process, stimulate debate and encourage public engagement. The issues paper sets out 11 no. main themes of the County Development Plan such as the Core Strategy, Climate and Environment, Housing, Employment, Tourism, Infrastructure etc.
- 1.3. In this regard, our client wishes to make a submission on the core strategy and settlement hierarchy of the county including the population projection and housing need and demand.
- 1.4. It is considered that there is a need for additional residential zoned lands to provide for a high quality housing stock to address housing needs in the country. This submission therefore seeks to highlight the overall shortfall in residential zoned lands and housing allocation within the county based on the settlement hierarchy and respectfully requests appropriate measures be considered in the

Managing Director: John P. Spain BSc MRUP MRICS ASCS MRTPI MIPi

Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPi Rory Kunz BA (MOD) MSc ERM MAT&CP Dip EIA Mgmt MIPi,
Stephen Blair BA (Mod) MRUP MIPi MRTPI Mary Mac Mahon MSc TCP 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

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preparation of the draft plan to adequately address these critical aspects of development within the county.

2.0 GROUNDS OF SUBMISSION

- 2.1. The issues paper sets out a number of categories such as population, housing, economic development, tourism, heritage, retail services and infrastructure to be considered within the preparation of the draft County Development Plan.
- 2.2. Our client's lands comprise of approximately 31 hectares located at Ballinahinch Lower, Newtownmountkennedy. The subject lands are zoned for integrated tourism/ leisure/ recreational complex in the Wicklow County Development Plan 2016-2022 (see map No. 07.03 of the existing County Plan).

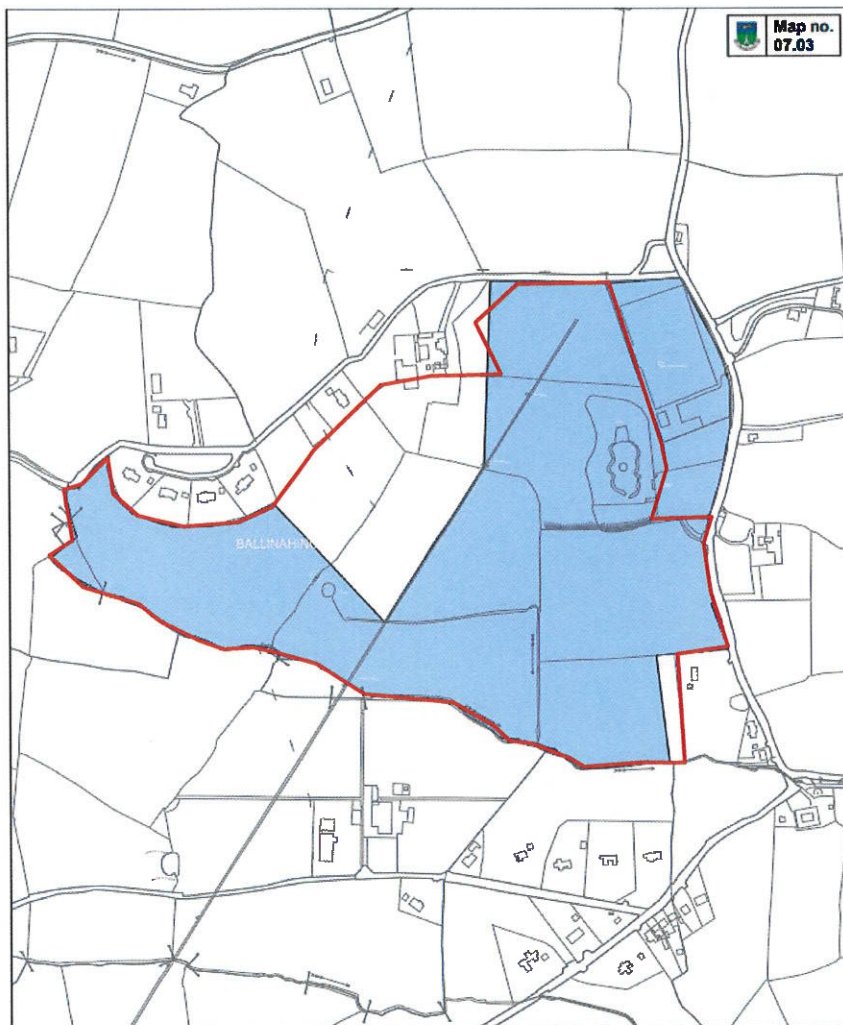


Figure 1: Current zoning of our clients lands outlined in red

- 2.3. The issues paper notes that the 2016-2022 County Development Plan identifies Newtownmountkennedy as a Moderate Growth Town. The population in Newtownmountkennedy has grown from 2,835 to 2,410 (17.6%) from 2011 to 2016. The significant increase in population clearly indicates the growing importance of Newtownmountkennedy and therefore suggests that there is a need

to re-consider the hierarchy of Newtownmountkennedy in the overall urban structure.

- 2.4. The RSES set out a new settlement hierarchy that should be incorporated into county structures. Self Sustaining Growth Towns are described as towns with a moderate level of jobs and services, including sub county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self sustaining.
- 2.5. Given the growth of Newtownmountkennedy in recent years, it is considered that Newtownmountkennedy should be designated as a Self -Sustaining Growth Town in the new County Development Plan.
- 2.6. We understand that future housing need in the county is likely to be based on the population projections as set out in the National Planning Framework Implementation Roadmap as issued to the Regional and Local Authorities in July 2018. However, these population projections are seen to be very conservative, result in a significant underestimation of future housing needs in the Dublin region.
- 2.7. The population and migration estimates published by the CSO in August 2018, show a 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.
- 2.8. If this rate of increase is applied up to 2040, it will result in an increase in population nationally of 1.486 million, which is significantly greater than set out in the NPF (an additional 0.385 million over the NPF higher figure).
- 2.9. While separate figures are not available, it is likely that the higher proportion of this population could have taken place in the greater Dublin area. It is likely therefore that the figures set out in the RSES are a further underestimate of actual population growth that is currently taking place and likely to continue for the foreseeable future.
- 2.10. It is respectfully submitted that it is vital that the preparation of the County Development Plan obtains accurate up to date data and current population for the County and the region and that the population housing needs are based on a current population growth level which reflect recent population growth levels, rather than the lower levels which have been predicted in preparation of the NPF.
- 2.11. Therefore, there is a need for Wicklow County Plan to take account of this latest data and actual population growth levels which have resulted in the need for provide accordingly, increased housing provision for the area.
- 2.12. 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.

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- 2.13. 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.
- 2.14. 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.
- 2.15. It is essential that in commencing housing need requirements, that the existing shortfall is recognised and addressed upfront. Failure to do so will simply build on a continuation of an existing housing crisis for the next planned period.
- 2.16. Further evidence of this shortfall of provision on the existing population can be seen in the CSO publication "Census Population 2016 – Profile 1 Housing in Ireland". Whilst this was the position as of more than 3 years ago, it already demonstrates problems arising from the shortfall in housing provision by that date which has been exacerbated since.
- 2.17. The current County Plan states that based on the existing zoning of lands that Newtownmountkennedy is at a deficit of zoned lands for residential development. In this context it is respectfully submitted that part of our client's lands be considered for re-zoning for residential development in the making of the Draft County Plan.
- 2.18. It should also be noted that the adopted RSES does not set out housing requirements for each constituent local authority and that this will only become available in the coming months once each local authority has completed a Housing Needs Demand Assessment (HNDA), based on a methodology to be determined by the Department of Housing, and issued to the local authorities by way of Guidelines. Either way it should be noted that these housing needs assessments will need to reflect the latest CSO data, and also have regard to current unmet housing demand in the preparation of the County Plan.
- 2.19. The recent reversal of a long established trend of falling average household size in urban areas has risen as a direct result of housing supply shortage and there is a need to provide for a correction factor, as well as reverting to longer trend decline in household sizes. This can be done within the population projections of the RSES, by adopting a population figure at the upper end of range, (having regard to latest CSO data) and using a much more realistic average household size for future requirements and for the adjustment for current shortfall.
- 2.20. 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."*

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>

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- *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."*
- 2.21. 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 will result in a very significant increase level of housing need over and above that based on the traditional population growth base only.
- 2.22. 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.
- 2.23. It is therefore respectfully submitted that the County Plan carefully consider the population projections of the county and in particular Newtownmountkennedy and designate the settlement hierarchy accordingly.
- 2.24. In addition, it is essential that the County Plan not only address the future need for housing in response to the growing population but in the first instance set out the current deficit of housing provision in the county for the existing population before assessing the additional housing need to address future population growth.
- 2.25. Our clients lands at Newtownmountkennedy have been previously granted planning permission in 2003 for an integrated tourism and leisure recreational complex comprising of a snow leisure centre, health and leisure academy, education centre, hotel with 184 no. bedrooms, 23 apartments, ancillary restaurants, bars, functions rooms and 18 hole golf course. Works commenced on this development and an extension of duration was granted by Wicklow County Council in 2010 for a further 5 years based on substantial works already carried out on the site. Development levies in excess of €1m were also paid to the County Council in respect of this development.



Figure 2: Aerial view of our clients lands outlined in red.

- 2.26. The subject lands at Newtownmountkennedy are therefore brownfield lands and should be utilised for future development in accordance with the objectives of the NPF and the RSES which encourage the regeneration of brownfield lands throughout the country. The NPF states that *"the target is for at least 40% of all new housing to be delivered within the existing built – up areas of cities, towns and villages on infill and / or brownfield sites"*. The NPF also states that *"the National Planning Framework targets a significant proportion of future urban development on infill. brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village"*.
- 2.27. As such it is considered that there is an opportunity to meet both the existing and future housing needs of the area on our clients lands, in accordance with the sustainable development objectives of the NPF and the RSES in the preparation of the new County Plan. Please see attached Appendix 1 which sets out the proposed suggested zoning for the subject lands at Newtownmountkennedy comprising residential (c. 25ha), nursing home / community and tourism and leisure.

3.0 CONCLUSIONS

- 3.1. This submission is made on behalf of our client, Paul Stanton on the Issues Paper for the Draft Wicklow County Development Plan 2021-2027. We would be grateful if this submission could be given careful consideration during the preparation of the Draft County Plan in the context set out above.
- 3.2. We look forward to a favorable response from the Authority in relation to the above and if you require any further information please do not hesitate to contact us.

Yours Sincerely,

John Spain

John Spain Associates

Appendix 1: Proposed Zoning Map of Newtownmountkennedy lands

