Full name Colum O'Broin

## Email

## What area does your submission relate to?

Core Strategy

## Your comments

Submission on Wicklow County Development Plan 2021-2027 Thank you for giving us the opportunity to make a submission to be considered in the development of your draft new County Development Plan.

I represent a group of landowners/developers with interests in Newtownmountkennedy and Kilcoole.

As this Plan will not be dealing with the designation and zoning of land in these two settlements which are both subject to separate Local Area Plans this submission will be limited in the main to the Core strategy/Settlement Strategy.

I have noted that the Settlement Strategy is constrained by the requirements of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Mid East, and the NPF Implementation document, and that accordingly the status of Newtownmountkennedy and Kilcoole must be recategorised.

Ever since the first Strategic Planning Guidelines for the Greater Dublin Area were adopted in 1999, Newtownmountkennedy has had a superior status to other towns in the county, and this has been restated in the two subsequent Regional Planning Guidelines for the Greater Dublin Area, and similarly in the Retail Planning Guidelines published in this period. There was logic initially in this designation, given Newtownmountkennedy's excellent connectivity and public transport, and available land to consolidate what is a relatively spread out settlement. In the meantime Newtownmountkennedy has attracted a high level of commercial infrastructure (large supermarket, shopping development, Hotel/Conference centre) that can serve a much greater population than currently exists in Newtown. I would thus request that Newtownmountkennedy be given the higher of the available designations in the RSES of Self-Sustaining Growth Town. Given the attributes that initially drove Newtown's previous designation in the previous three Planning Guidelines, and the commercial infrastructure already developed based on that designation, I would request that the target population remain at least at its current level of 6000.

Kilcoole also has long planning pedigree, going back to its rapid growth in the early 1970s, but has been in the shadow of Greystones since. The previous CDPs for the past 25 years have always promoted growth in Kilcoole, and this has to some extent been realised. However the growth of commercial and employment infrastructure in this period has been considerable, again supplying what was envisaged for the ultimate population of the town, and more, as the density of employment numbers to the hectare has increased dramatically reflecting the move away from manufacturing to higher skilled services businesses. Kilcoole

at this stage provides the employment infrastructure for many types of businesses that would otherwise have been located in Greystones.

Wicklow County Council appears to have realised this, together with the fact that higher level and bulk retail for Kilcoole and the railway station was located in Greystones, in deciding in the 2013 Local Area Plan to amalgamate Greystones and Kilcoole into a single planning unit, while protecting the unique features and community cultures of both by retaining a small greenbelt between the two towns. This made sense as the two communities exhibit great synergies. I would thus request that you consider reflecting this reality by combining the two settlements into one unit in the County Development Plan, designate it as a Self-Sustaining Growth Town and part of the planned development of strategic development areas in Greystones (as envisaged in the Dublin Metropolitan Area Strategic Plan), and give a combined population allocation, which should at least be the same as the current populations allocated in the current County Development Plan to these towns.

Finally I request that you consider using the lower rate of density as required by The Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) when computing the gross amount of zoned land for these towns. I acknowledge that the issue of the slow take up of zoned land for development was dealt with to a certain extent in the National Planning Framework, but the 25% headroom is a vast underestimate of what is required. Many landowners are happy to sit on what is generally an appreciating asset, denying supply of land that is desperately needed to address not only the current housing deficit, but also the extremely high price of development land in Wicklow, that rivals the price of development land much closer to Dublin, and well in excess of the other counties that surround the Dublin metropolitan area. This in turn factors in to the price of houses in Wicklow, that is verging on the unaffordable for middle income earners. Only by having a greater choice of land for development will houses be delivered and at a lower price. I would thus urge you to preserve the greatest amount of flexibility for when the Local Area Plan process begins, in decisions that are cemented in the County Development Plan.

Submission on Wicklow County Development Plan 2021-2027

Thank you for giving us the opportunity to make a submission to be considered in the development of your draft new County Development Plan.

I represent a group of landowners/developers with interests in Newtownmountkennedy and Kilcoole.

As this Plan will not be dealing with the designation and zoning of land in these two settlements which are both subject to separate Local Area Plans this submission will be limited in the main to the Core strategy/Settlement Strategy.

I have noted that the Settlement Strategy is constrained by the requirements of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Mid East, and the NPF Implementation document, and that accordingly the status of Newtownmountkennedy and Kilcoole must be recategorised.

Ever since the first Strategic Planning Guidelines for the Greater Dublin Area were adopted in 1999, Newtownmountkennedy has had a superior status to other towns in the county, and this has been restated in the two subsequent Regional Planning Guidelines for the Greater Dublin Area, and similarly in the Retail Planning Guidelines published in this period. There was logic initially in this designation, given Newtownmountkennedy's excellent connectivity and public transport, and available land to consolidate what is a relatively spread out settlement. In the meantime Newtownmountkennedy has attracted a high level of commercial infrastructure (large supermarket, shopping development, Hotel/Conference centre) that can serve a much greater population than currently exists in Newtown. I would thus request that Newtownmountkennedy be given the higher of the available designations in the RSES of Self-Sustaining Growth Town. Given the attributes that initially drove Newtown's previous designation in the previous three Planning Guidelines, and the commercial infrastructure already developed based on that designation, I would request that the target population remain at least at its current level of 6000.

Kilcoole also has long planning pedigree, going back to its rapid growth in the early 1970s, but has been in the shadow of Greystones since. The previous CDPs for the past 25 years have always promoted growth in Kilcoole, and this has to some extent been realised. However the growth of commercial and employment infrastructure in this period has been considerable, again supplying what was envisaged for the ultimate population of the town, and more, as the density of employment numbers to the hectare has increased dramatically reflecting the move away from manufacturing to higher skilled services businesses. Kilcoole at this stage provides the employment infrastructure for many types of businesses that would otherwise have been located in Greystones.

Wicklow County Council appears to have realised this, together with the fact that higher level and bulk retail for Kilcoole and the railway station was located in Greystones, in deciding in the 2013 Local Area Plan to amalgamate Greystones and Kilcoole into a single planning unit, while protecting the unique features and community cultures of both by retaining a small greenbelt between the two towns. This made sense as the two communities exhibit great synergies. I would thus request that you consider reflecting this reality by combining the two settlements into one unit in the County Development Plan, designate it as a Self-Sustaining Growth Town and part of the planned development of strategic development areas in Greystones (as envisaged in the Dublin Metropolitan Area Strategic Plan), and give a combined population allocation, which should at least be the same as the current populations allocated in the current County Development Plan to these towns.

Finally I request that you consider using the lower rate of density as required by The Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) when computing the gross amount of zoned land for these towns. I acknowledge that the issue of the slow take up of zoned land for development was dealt with to a certain extent in the National Planning Framework, but the 25% headroom is a vast underestimate of what is required. Many landowners are happy to sit on what is generally an appreciating asset, denying supply of land that is desperately needed to address not only the current housing deficit, but also the extremely high price of development land in Wicklow, that rivals the price of development land much closer to Dublin, and well in excess of the other counties that surround the Dublin metropolitan area. This in turn factors in to the price of houses in Wicklow, that is verging on the unaffordable for middle income earners. Only by having a greater choice of land for development will houses be delivered and at a lower price. I would thus urge you to preserve the greatest amount of flexibility for when the Local Area Plan process begins, in decisions that are cemented in the County Development Plan.

I represent a group of landowners/developers with interests in Newtownmountkennedy and Kilcoole. As this Plan will not be dealing with the designation and zoning of land in these two settlements which are both subject to separate Local Area Plans this submission will be limited in the main to the Core strategy/Settlement Strategy. I have noted that the Settlement Strategy is constrained by the requirements of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Mid East, and the NPF Implementation document, and that accordingly the status of Newtownmountkennedy and Kilcoole must be recategorised.

Ever since the first Strategic Planning Guidelines for the Greater Dublin Area were adopted in 1999, Newtownmountkennedy has had a superior status to other towns in the county, and this has been restated in the two subsequent Regional Planning Guidelines for the Greater Dublin Area, and similarly in the Retail Planning Guidelines published in this period. There was logic initially in this designation, given Newtownmountkennedy's excellent connectivity and public transport, and available land to consolidate what is a relatively spread out settlement. In the meantime Newtownmountkennedy has attracted a high level of commercial infrastructure (large supermarket, shopping development, Hotel/Conference centre) that can serve a much greater population than currently exists in Newtown. I would thus request that Newtownmountkennedy be given the higher of the available designations in the RSES of Self-Sustaining Growth Town. Given the attributes that initially drove Newtown's previous designation in the previous three Planning Guidelines, and the commercial infrastructure already developed based on that designation, I would request that the target population remain at least at its current level of 6000.

Kilcoole also has long planning pedigree, going back to its rapid growth in the early 1970s, but has been in the shadow of Greystones since. The previous CDPs for the past 25 years have always promoted growth in Kilcoole, and this has to some extent been realised. However the growth of commercial and employment infrastructure in this period has been considerable, again supplying what was envisaged for the ultimate population of the town, and more, as the density of employment numbers to the hectare has increased dramatically reflecting the move away from manufacturing to higher skilled services businesses. Kilcoole at this stage provides the employment infrastructure for many types of businesses that would otherwise have been located in Greystones.

Wicklow County Council appears to have realised this, together with the fact that higher level and bulk retail for Kilcoole and the railway station was located in Greystones, in deciding in the 2013 Local Area Plan to amalgamate Greystones and Kilcoole into a single planning unit, while protecting the unique features and community cultures of both by retaining a small greenbelt between the two towns. This made sense as the two communities exhibit great synergies. I would thus request that you consider reflecting this reality by combining the two settlements into one unit in the County Development Plan, designate it as a Self-Sustaining Growth Town and part of the planned development of strategic development areas in Greystones (as envisaged in the Dublin Metropolitan Area Strategic Plan), and give a combined population allocation, which should at least be the same as the current populations allocated in the current County Development Plan to these towns. Finally I request that you consider using the lower rate of density as required by The Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) when computing the gross amount of zoned land for these towns. I acknowledge that the issue of the slow take up of zoned land for development was dealt with to a certain extent in the National Planning Framework, but the 25% headroom is a vast underestimate of what is required. Many landowners are happy to sit on what is generally an appreciating asset, denying supply of land that is desperately needed to address not only the current housing deficit, but also the extremely high price of development land in Wicklow, that rivals the price of development land much closer to Dublin, and well in excess of the other counties that surround the Dublin metropolitan area. This in turn factors in to the price of houses in Wicklow, that is verging on the unaffordable for middle income earners. Only by having a greater choice of land for development will houses be delivered and at a lower price. I would thus urge you to preserve the greatest amount of flexibility for when the Local Area Plan process begins, in decisions that are cemented in the County Development Plan.

Submission on Wicklow County Development Plan 2021-2027

Thank you for giving us the opportunity to make a submission to be considered in the development of your draft new County Development Plan.

I represent a group of landowners/developers with interests in Newtownmountkennedy and Kilcoole.

As this Plan will not be dealing with the designation and zoning of land in these two settlements which are both subject to separate Local Area Plans this submission will be limited in the main to the Core strategy/Settlement Strategy.

I have noted that the Settlement Strategy is constrained by the requirements of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Mid East, and the NPF Implementation document, and that accordingly the status of Newtownmountkennedy and Kilcoole must be recategorised.

Ever since the first Strategic Planning Guidelines for the Greater Dublin Area were adopted in 1999, Newtownmountkennedy has had a superior status to other towns in the county, and this has been restated in the two subsequent Regional Planning Guidelines for the Greater Dublin Area, and similarly in the Retail Planning Guidelines published in this period. There was logic initially in this designation, given Newtownmountkennedy's excellent connectivity and public transport, and available land to consolidate what is a relatively spread out settlement. In the meantime Newtownmountkennedy has attracted a high level of commercial infrastructure (large supermarket, shopping development, Hotel/Conference centre) that can serve a much greater population than currently exists in Newtown. I would thus request that Newtownmountkennedy be given the higher of the available designations in the RSES of Self-Sustaining Growth Town. Given the attributes that initially drove Newtown's previous designation in the previous three Planning Guidelines, and the commercial infrastructure already developed based on that designation, I would request that the target population remain at least at its current level of 6000.

Kilcoole also has long planning pedigree, going back to its rapid growth in the early 1970s, but has been in the shadow of Greystones since. The previous CDPs for the past 25 years have always promoted growth in Kilcoole, and this has to some extent been realised. However the growth of commercial and employment infrastructure in this period has been considerable, again supplying what was envisaged for the ultimate population of the town, and more, as the density of employment numbers to the hectare has increased dramatically reflecting the move away from manufacturing to higher skilled services businesses. Kilcoole at this stage provides the employment infrastructure for many types of businesses that would otherwise have been located in Greystones.

Wicklow County Council appears to have realised this, together with the fact that higher level and bulk retail for Kilcoole and the railway station was located in Greystones, in deciding in the 2013 Local Area Plan to amalgamate Greystones and Kilcoole into a single planning unit, while protecting the unique features and community cultures of both by retaining a small greenbelt between the two towns. This made sense as the two communities exhibit great synergies. I would thus request that you consider reflecting this reality by combining the two settlements into one unit in the County Development Plan, designate it as a Self-Sustaining Growth Town and part of the planned development of strategic development areas in Greystones (as envisaged in the Dublin Metropolitan Area Strategic Plan), and give a combined population allocation, which should at least be the same as the current populations allocated in the current County Development Plan to these towns.

Finally I request that you consider using the lower rate of density as required by The Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) when computing the gross amount of zoned land for these towns. I acknowledge that the issue of the slow take up of zoned land for development was dealt with to a certain extent in the National Planning Framework, but the 25% headroom is a vast underestimate of what is required. Many landowners are happy to sit on what is generally an appreciating asset, denying supply of land that is desperately needed to address not only the current housing deficit, but also the extremely high price of development land in Wicklow, that rivals the price of development land much closer to Dublin, and well in excess of the other counties that surround the Dublin metropolitan area. This in turn factors in to the price of houses in Wicklow, that is verging on the unaffordable for middle income earners. Only by having a greater choice of land for development will houses be delivered and at a lower price. I would thus urge you to preserve the greatest amount of flexibility for when the Local Area Plan process begins, in decisions that are cemented in the County Development Plan.

## **Created On**

2020-01-09