

[REDACTED]

Sent: 10 January 2020 16:45
To: 'Paul Turley'
Subject: RE: Wicklow County Development Plan 2021-2027

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: Paul Turley [REDACTED]
Sent: 10 January 2020 15:07
To: Planning - Plan Review
Cc: John Spain
Subject: Wicklow County Development Plan 2021-2027
Importance: High

Dear Sir / Madam,

Please find attached a pre-draft submission on the new Wicklow County Development Plan 2021-2027 on behalf of our client, Kimpton Vale Limited.

We would be grateful if you could confirm receipt of this submission.

Kind regards,

Paul Turley, *Executive Director*
John Spain Associates,
39 Fitzwilliam Place,
Dublin 2.
D02 ND61

[REDACTED]
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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: PRE-DRAFT SUBMISSION ON THE PREPARATION OF THE WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027

1.0 INTRODUCTION

- 1.1 On behalf of our client, Kimpton Vale Ltd, Collegefort, Carpenterstown Road, Castleknock, Dublin 15, we John Spain Associates, 39 Fitzwilliam Place, Dublin 2 wish to make a submission on the preparation of the new Wicklow County Development Plan 2021 – 2027, focusing in particular on how the new Development Plan relates to the town of Kilcoole.
- 1.2 As this is a pre-draft submission we intend to focus on issues of strategic importance to the future growth and sustainable development of the County, with an emphasis on the settlement of Kilcoole. Therefore, this submission has regard to the key issues and questions raised in the public consultation booklet titled 'Wicklow County Development Plan 2021 - 2027 Issues Booklet'. These key issues and questions are discussed further in Section 2 and 3.
- 1.3 The purpose of this submission is to respectfully request that an appropriate planning policy framework is in place within the forthcoming County Development Plan to ensure the most efficient and effective use of serviced and accessible lands at Kilcoole to support the future requirements of the County and to provide for and ensure such lands are utilised to help facilitate the needs of local communities, including the existing housing need in the vicinity.
- 1.4 Our client is the owner of a significant landholding at Kilcoole. While the current pre-draft submission does not relate specifically to this landholding, or its zoning, and seeks to make more strategic points, the context and location of the landholding are set out in Appendix 1 of this submission for information purposes.

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- 1.5 This submission sets out that the housing need and demand assessment, and subsequently the Core Strategy for the new Development Plan should take into account the existing significant pent up demand and long term build-up of housing need (based on sustained under-delivery- which has manifested itself in the ongoing housing crisis and subsequent Government actions to address the crisis in a longer term sustainable manner), when approaching the allocation of housing growth and population in the county going forward.
- 1.6 On this basis, it is submitted that any need and demand assessment should be conducted based on the latest figures, bearing in mind that the projections contained in the NPF Implementation Roadmap have already proven to be conservative, risking a failure to match the delivery of housing with actual population growth and household formation.
- 1.7 It is further set out below that the growth of the town of Kilcoole should be dealt with in an integrated manner under the forthcoming new County Development Plan, along with the adjacent areas of Delgany and Greystones. This is reflective of the functional connections between these urban areas as acknowledged under the current Local Area Plan for the area and good quality public transport connections which these settlements within the County benefit from.
- 1.8 Furthermore, it is submitted that Kilcoole represents an opportunity to provide for good quality, compact urban growth, which is served by a good range of facilities and services, at a location which allows for the delivery of further services and supports concurrently with housing delivery.
- 1.9 The town is well suited to the delivery of a mix of housing types at a sustainable density in accordance with the prevailing national and regional planning policy context, with which the forthcoming Development Plan must accord.

2.0 POINTS OF RELEVANCE IN THE PRE-DRAFT ISSUES PAPER

- 2.1 The Issues Paper is organised under a series of headings, corresponding to chapters of the future Draft Development Plan. The document provides background information under each heading, along with a series of key questions, on which feedback is sought from the public. This submission picks up on several of the key themes and individual questions set out within the Issues Paper and responds to these.
- 2.2 This section examines the relevant provisions within the Issues Paper, with a response provided in Section 3 of the document, along with any other relevant grounds of submission intended to inform the Draft Plan preparation process.

Core Strategy and Settlement Hierarchy

- 2.3 The issues paper notes that the population of County Wicklow increased from 136,640 in 2011 to 142,425 in 2016. Kilcoole's population increased from 4,049 to 4,239 persons over the 5-year intercensal period, representing an increase of 4.7%.
- 2.4 The Issue Paper reiterates the settlement hierarchy of the current Development Plan (Kilcoole is designated as a small growth town) and notes the settlement hierarchy set down in the EMRA RSES, whereby it is noted that the identification of Self-Sustaining Growth Towns, Self-Sustaining Towns, and Towns and Villages will fall to individual Planning Authorities within their Development Plans.

2.5 The Issues Paper goes on to note the goals of the National Planning Framework as it relates to the promotion of compact and sustainable growth patterns.

2.6 Finally, the Issues Paper poses several pertinent questions in relation to the Core Strategy, which are of relevance to the current submission:

- *“What is the best designation for your town?”*
- *What towns and villages should be promoted for population growth?*
- *Do you think your town has the capacity to sustain more housing growth? If so, why?*
- *Do you think that the level of housing development in your town has been matched by adequate infrastructure and services?*
- *How should we deliver compact growth in each of the County’s towns and villages? What is required to make our towns more self-sustaining?”*

2.7 Section 3 below, seeks to suggest responses to these important questions, as they relate to the town of Kilcoole and its designation in the settlement hierarchy of the forthcoming plan and associated apportioning of population growth.

Housing

2.8 Pages 12-14 of the Issues Paper deal with housing in the county. The changes to the policy setting on housing since the adoption of the current Development Plan are recognised, including Rebuilding Ireland, as are the current issues around housing supply and the need to deliver a sustained and sufficient level of housing delivery going forward, in order to meet existing and future housing need and demand.

2.9 The Issues Paper sets out that a new housing strategy will form part of the Development Plan, to be informed by a Housing Need and Demand Assessment, which will include a long-term strategic assessment of housing need across all tenures.

2.10 The Paper also refers to the NPF policies supporting denser development than is currently provided for in Wicklow in many locations under the current Development Plan and LAPs. It is noted that higher densities must be achieved, in the order of 30 to 50 dwellings per hectare, in order to accord with the provisions of the NPF and the Guidelines on Sustainable Residential Development in Urban Areas.

2.11 The Paper goes on to set out key questions around housing in the county. Several of these are relevant to the current submission, and these are set out below for ease of reference:

- *“What types of houses are required to meet housing demand?”*
- *Where can high density development be accommodated?*
- *How can increased densities be achieved in Wicklow’s towns and villages?”*

3.0 KEY ISSUES & GROUNDS OF SUBMISSION

Core Strategy - Housing Need and Demand

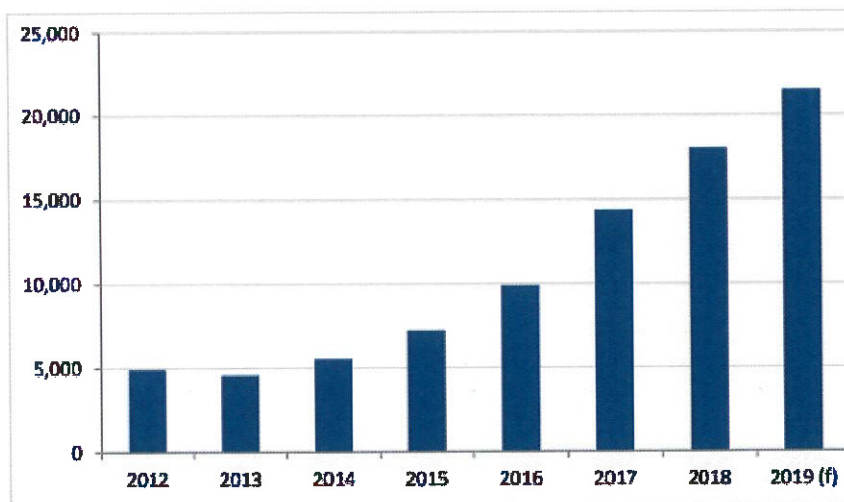
3.1 As set out within the Issues Paper, the new Draft Development Plan will include a new Core Strategy, allocating the delivery of new housing (as a proxy for population growth) within the county. The new Core Strategy will be predicated on a Housing Need and Demand Assessment for the county.

- 3.2 We note the submission made by the Eastern and Midlands Regional Assembly¹ on the current pre-draft stage of the Development Plan, which highlights the necessity for the new Development Plan to accord with the framework and hierarchy of plans at regional and national level (i.e. the NPF and the RSES for the EMRA), a hierarchy which is now defined in statute. The EMRA submission also highlights the figures and projections contained within the Implementation Roadmap for the National Planning Framework. The intention is that these figures will feed into population projections and subsequently housing allocations in Development Plan Core Strategies.
- 3.3 As will be detailed hereunder, however, it is incumbent on Planning Authorities to consider housing need and demand in a comprehensive manner, and it would not be appropriate to gauge the necessary number of housing units based on NPF Implementation Roadmap population projections alone.
- 3.4 Firstly, it is submitted that notwithstanding their relative recency, the population projections set down within the NPF Roadmap have already proved overly conservative in some respects, with population growth proceeding at a higher trajectory than was provided for.
- 3.5 Recent trends show that population growth is set to continue having regard to the Region's young demographic profile and a return to net inward migration as the country returns to economic growth after a severe economic crash in 2007. In fact, the level of in-migration to Ireland experienced over the last two years which is in the order of 30,000+, is well in excess of the figure of 8,000 p.a. used in the NPF population projections. This alone suggests that the NPF population projections for the metropolitan and core areas of the Eastern and Midlands region are likely to be overly conservative. The Implementation Roadmap provides for projected estimated population growth of 12,500 – 15,000 over the intercensal period to 2026. It is apparent that the County Development Plan needs to reflect the up to date position in relation to population growth and housing need. Failure to do so would result in an exacerbation in the existing housing crisis in the County and in the region.
- 3.6 Recent population data as published by the CSO in the interim period since the publication of the NPF in early 2018, shows a higher level of inward migration and higher level of population growth than anticipated in the NPF roadmap.
- 3.7 The population and migration estimates published by the CSO in August 2018, show a population increase from 4.792 million people in April 2017 to 4.857 million people in April 2018.
- 3.8 Further, more recent figures released in August 2019 show a further increase in population from 4.857 million in April 2018 to 4.921 million in April 2019. This represents an annual rate of increase in recent years of approximately 1.3%, based on a combination of migration and natural increase.
- 3.9 If this rate of increase is applied up to 2040, it will result in an increase in population nationally of to c. 6.372 million, which is significantly greater than set out in the NPF (c. 5.7 million based on ESRI projections at the time).
- 3.10 While more granular / county level figures are not available, it is likely that the higher proportion of this population growth may take place in the Greater Dublin Area based on long standing and more recent trends in the growth of this area of the country. It

¹ Made publicly available at: https://www.wicklow.ie/Portals/0/Documents/Planning/Development-Plans-Strategies/Submissions/A7_Eastern%20&%20Midland%20Regional%20Assembly.pdf

is likely therefore that the figures set out in the RSES and the NPF Implementation Roadmap are a further underestimate of actual population growth than is currently taking place and likely to continue for the foreseeable future.

- 3.11 It is respectfully submitted that the preparation of the County Development Plan should be based on accurate up to date data and current population for the County and the region and that the population housing needs should be based on a current population growth level which reflects recent population growth levels, rather than the lower levels which have been predicted in preparation of the NPF. We note that the Eastern and Midlands Regional Assembly have set out in their submission on the pre-draft stage of the Development Plan, that the EMRA would be available to assist in the preparation of the housing need and demand assessment for the county.
- 3.12 When combined with a significant existing shortage in housing, predicated on almost of a decade of extremely low levels of housing completions, any housing need and demand assessment carried out must avoid prolonging or locking in housing shortages over the medium-term Development Plan Period.
- 3.13 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.



Sources: CSO and QEC Forecasts.

Figure 1: Yearly housing completions for the State – 2019 figure forecasted by ESRI

- 3.14 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).
- 3.15 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.

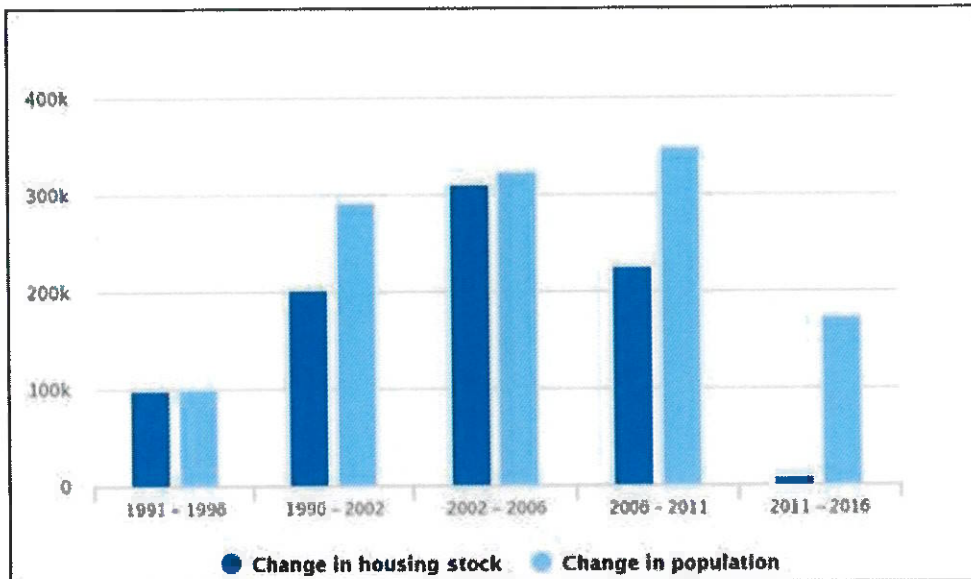


Figure 2: Changes in population and housing stock for Ireland, 1991-2016 (data from the Central Statistics Office, 2017)

- 3.16 The 2011-2016 intercensal period also saw a notable increase in the number of households with more persons than rooms in their dwelling (see Figure 3 below). There were 95,013 permanent households with more persons than rooms according to Census 2016, a 28 per cent rise on the equivalent number in 2011 (73,997).
- 3.17 Close to 10 per cent of the population resided within these households in 2016 at an average of 4.7 persons per household. This is an indicator of increased overcrowding (and housing need) which may be attributed to lack of housing availability and rising costs.

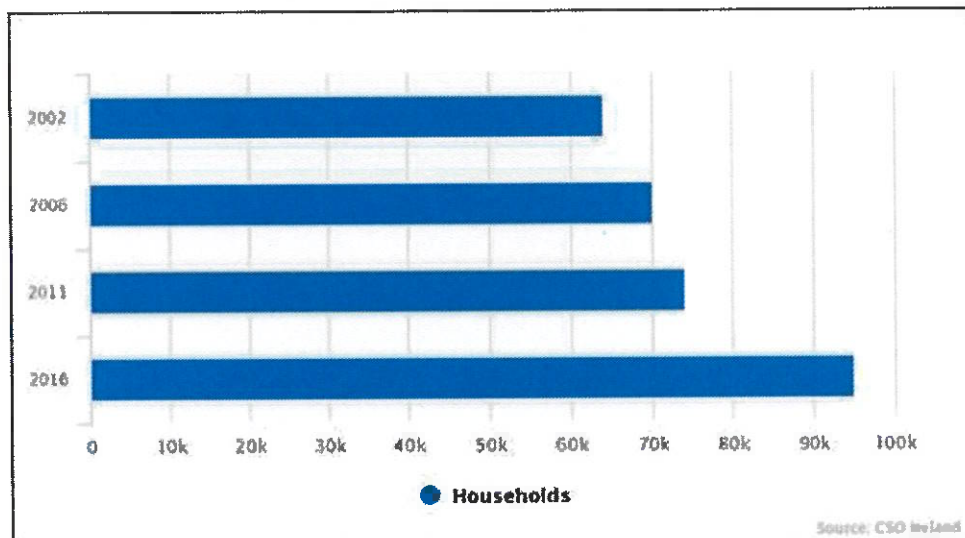


Figure 3: Number of households with more persons than rooms (data from the Central Statistics Office, 2017)

- 3.18 These figures set out above all point to a significant and increasing housing need in the state which is not being met at present.

- 3.19 Actual demand for housing, underpinned by new household formation and population trends has been variously estimated at c. 32,000 units per year², 34,000³, and 35,000⁴ over the coming years.
- 3.20 The Central Bank of Ireland has published a study entitled 'Population Change and Housing Demand in Ireland'⁵, 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."*
- 3.21 The significant pent up demand and need for housing in the State must be borne in mind when undertaking Housing Need and Demand Assessment for the forthcoming Draft Development Plan, as to peg housing delivery over the plan period to projected population growth only (while not addressing the backlog of housing need and demand which has built up in recent years), would lead to prolonged shortages, with housing need going unmet, with associated impacts on affordability and housing choice – both of which are important considerations in the functioning and competitiveness of the wider economy of the county and the State.
- 3.22 On this basis, we would respectfully request the Planning Authority to carefully consider existing and pent up housing need and demand when preparing the Core Strategy, rather than allocating housing solely on future projected population growth. This matter requires careful consideration and consultation with the Department of Housing and Planning and the EMRA, to ensure all forthcoming Development Plans do not underestimate the population targets they should be providing for in planning for the development of their Counties.

Designation of Kilcoole and Key Questions

- 3.23 The Issues Paper poses questions in relation to core strategy and housing allocation, as set out above, which are directly relevant to the consideration of Kilcoole and its future growth and development. Each of these relevant questions is re-stated below, with a brief response provided.
- *What is the best designation for your town?*
- 3.24 Whilst Kilcoole could be designated as a 'town' under the Settlement Strategy for the new Development Plan, it is submitted that it would be more appropriate to link the growth of the town with the nearby Self-Sustaining Growth Town of Greystones and with Delgany. This would acknowledge the existing relationship between these settlements, the high quality public transport facilities serving the settlements and the potential to plan for greater growth in Kilcoole than would be possible under a 'Town' designation.

² IBEC, 2019

³ Central Bank, 2019

⁴ AIB, 2019

⁵ Available at: <https://www.centralbank.ie/news-media/press-releases/press-release-economic-letter-population-change-and-housing-demand-in-ireland-10-december-2019>

3.25 These towns are linked for the purposes of the current Greystones-Delgany & Kilcoole Local Area Plan 2013 – 2019, the current LAP for the area, which is reflective of the appropriateness of a coordinated and joined-up approach to the development of the area. It is submitted that the relationship of Kilcoole with the Self-Sustaining Growth Town of Greystones should be maintained going forward under the new County Development Plan.

3.26 Notwithstanding the existence of a green belt between these two urban areas, the growth and development of these areas is linked functionally due to their close proximity. Kilcoole benefits from its proximity to Greystones and Delgany in terms of access to high quality transport links, retail and employment opportunities. The town of Kilcoole itself is served by commuter rail and bus services.

3.27 This relationship is acknowledged in Chapter 3 of the current County Development Plan, as follows:

*“The catchment of Greystones extends to Kilcoole, Newcastle and Kilpedder. **Kilcoole in particular has strong links to Greystones**, illustrated by the ‘vision’ set out in the Greystones-Delgany and Kilcoole LAP 2013-2019 which aims to capitalize on the dynamism between the settlements so that the combined area functions as a successful and sustainable entity, whereby each settlement retains their own separate identity and provides services and facilities for its own local population.” (Emphasis added)*

3.28 Given the functional relationship between Kilcoole and Greystones / Delgany, it is consequently submitted that this relationship should be recognised in planning terms going forward, reflecting the existing policy context of the Greystones-Delgany & Kilcoole Local Area Plan 2013 – 2019. For the purposes of housing allocation and population growth, this will involve dealing with this overall area in a comprehensive and integrated manner, including apportioning housing delivery to encourage the sustainable growth and development of Kilcoole under the new core strategy.

➤ *What towns and villages should be promoted for population growth?*

3.29 Kilcoole is considered to represent an opportunity for compact, sustainable growth, based on logical, infrastructure-led extension of the town. The 2016-2022 Development Plan identifies a shortfall in zoned land within Kilcoole to meet its population target, which is to be addressed in the future LAP for the area. We request that the new Plan support this and additional growth for Kilcoole as discussed below.

3.30 Whilst some local infrastructural constraints have been highlighted by Irish Water as part of the SHD process for the Bullford application, our client has been liaising with Irish Water to address such constraints in the context of the ongoing SHD pre-application process in respect of the southern portion of their landholding. Greystones waste water treatment plant has been designed with capacity to cater for Delgany and Kilcoole. We understand that Irish Water are investigating whether some minor upgrades to local pumping infrastructure is required to facilitate any significant development projects. It is considered appropriate to provide for a sustainable level of population growth to vindicate this investment of public monies in the resourcing and servicing of the area.

3.31 Appendix 3 of the National Planning Framework sets out a methodology for a tiered approach to land zoning. Tier 1 land, appropriate for zoning and short term development is defined as follows:

“This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.

These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.

Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.”

- 3.32 Kilcoole provides an opportunity to designate appropriately located lands for development over the forthcoming Development Plan period, which have existing access to services.
- 3.33 Further lands at Kilcoole may be suitable for Tier 2 zoning, as defined in the NPF. Such lands may not currently benefit from access to all necessary services to enable immediate development, but these lands have the potential to become fully serviced within the lifetime of the plan.
- 3.34 The current designated strategic landbank to the west of the town of Kilcoole constitutes an opportunity to provide for appropriately located population growth over the lifetime of the forthcoming new Development Plan.
- *Do you think your town has the capacity to sustain more housing growth? If so, why?*
- 3.35 The town of Kilcoole has the capacity to sustain housing growth over the operational period of the new Development Plan, based on existing population, local services, good quality public transport links and the limited growth experienced during the last development plan period.
- *Do you think that the level of housing development in your town has been matched by adequate infrastructure and services?*
- 3.36 The town of Kilcoole has seen only muted housing delivery to date, however the town is considered to be well served in terms of infrastructure and services to support further growth. It is also noted that the town provides opportunities for further delivery of services and amenities, due to the existence of currently undeveloped lands along the main street, which are at present subject to a town centre zoning. The SHD development currently at pre-application stage for part of our client's lands includes delivering important new infrastructure and facilities on the main street, including community uses, retail and employment locations, and a childcare facility.
- 3.37 In the context of the SHD pre-application process, the WCC Community Section were consulted. It was noted that Kilcoole is well served in many respects (with a community hall, a scout den, and a recently completed playground) however there was an identified need for an innovation / community hub-type facility. Therefore, it is considered that the delivery of such a facility should accompany future housing delivery in the town.
- 3.38 In terms of local school provision, the Minister for Education and Skills, Mr. Richard Bruton, T.D., announced plans on 13th April 2018 for the establishment of a new 8-

classroom primary school in Kilcoole, forecast for completion in the short term. This announcement followed demographic exercises carried out by Government into the current and future need for primary and post-primary school places across the country. The proposed size of the school is based on current projected need and responds to patronage and demographic demand in the area.

- 3.39 Thus, it is submitted that Kilcoole has the commensurate services to underpin past and future housing delivery and population growth, subject to the integrated delivery of additional services along the main street, concurrently with residential development.

➤ *How should we deliver compact growth in each of the County's towns and villages? What is required to make our towns more self-sustaining?"*

- 3.40 It is submitted that Kilcoole provides an opportunity for a compact extension of its existing built up area, in particular via contiguous development to the west of the main street. This approach to the development of the town has the benefit of concurrently mending the gaps in the streetscape along the main street and allows for the delivery of mixed uses onto this key street, with sustainable, compact residential development further to the west and northwest.

Housing in Kilcoole and Development Density

- 3.41 As set out above, the Issues Paper sets out several pertinent discussion points and questions in relation to housing types and densities, which are dealt with in further detail and responded to below.

➤ *What types of houses are required to meet housing demand?*

- 3.42 The town of Kilcoole requires a range of housing types and formats to respond to existing demand, as identified by our clients in their previous SHD application at Kilcoole, and the ongoing pre-application process for a revised SHD development. The current SHD pre-application proposal constitutes a range of houses and duplex / apartment units, with higher densities providing an urban edge to the main street, with more apartment type development and a mix of uses, and densities and intensity of development reducing to the west. This mix of housing types and formats is considered appropriate for Kilcoole in a broader sense, as the town could benefit from a greater overall mix of housing types (at present the housing stock is weighted heavily towards detached and semi-detached houses, at low densities).

- 3.43 Such a housing mix also ensures consistency with national and regional policy, all of which supports a proliferation of more compact urban form, as expressly recognised in the pre-draft issues paper.

➤ *Where can high density development be accommodated?*

- 3.44 Whilst Kilcoole is not considered suitable for city centre type densities, it is considered that the town does have the capacity, and would benefit from, higher density development, to provide a more sustainable development pattern going forward. Hitherto, the development of the town has focused primarily on lower densities, often circa 20 dwellings to the hectare or lower, whereas current policy, including the National Planning Framework and the Guidelines for Sustainable Development in Urban Areas underline the need for compact, sustainable development in order to reduce land take and encourage a reduction in car usage by creating walkable urban areas which are less spread out.

- 3.45 A denser urban form of c. 35 units per hectare can offer significant benefits also in terms of the efficiency of servicing residential development, when compared to a more dispersed development pattern.

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

- 3.46 In Kilcoole, increased density can be achieved by delivering a mix of uses and higher densities on town centre lands along the main street, with densities and heights reducing further away from the main street. The existing gaps in the streetscape in the centre of Kilcoole provide a unique opportunity to mend the urban fabric of the town, whilst introducing elements of mixed use and higher density development which provide for direct access onto the main street and to local facilities and amenities.

4.0 CONCLUSION

- 4.1 As set out in detail above, the housing need and demand assessment, and subsequently the Core Strategy for the new Development Plan, must take into account the existing significant pent up demand and long term build-up of housing need based on sustained under-delivery, when approaching the allocation of housing growth and population in the county going forward.
- 4.2 As has been set out herein, to ignore this pent-up need and demand could (at worst) prolong and lock-in housing undersupply, or housing crisis over the medium to long term. On this basis, it is submitted that any need and demand assessment should be conducted based on the latest figures, bearing in mind that the projections contained in the NPF Implementation Roadmap have already proven to be conservative, risking a failure to match the delivery of housing with actual population growth and household formation.
- 4.3 It is respectfully submitted that the growth of the town of Kilcoole should be dealt with in an integrated manner under the forthcoming new County Development Plan, along with the adjacent areas of Delgany and Greystones. This is reflective of the functional connections between these urban areas as acknowledged under the current Local Area Plan for the area.
- 4.4 Furthermore, it is submitted that Kilcoole represents an opportunity to provide for good quality, compact urban growth, which is served by a good range of facilities and services, at a location which allows for the delivery of further services and supports concurrently with housing delivery.
- 4.5 We respectfully request that the Planning Authority give consideration to the strategic issues raised in this submission during the preparation of the new Draft Development Plan for Wicklow for the period from 2021-2027. We look forward to the opportunity to make further submissions on the Development Plan as it proceeds through the public consultation process.

Yours faithfully



John Spain Associates

Appendix 1 - Kimpton Vale Ltd. Landholding at Kilcoole

Our clients' lands at Kilcoole take in a significant area located to the west of the town's main street. The lands are bound to the east by the main street, and by the rear boundaries of properties facing onto the main street of Kilcoole and New Road. The lands are bound by a stream along much of their western boundary, beyond which lie agricultural lands. The extent of the overall landholding is illustrated in the aerial image below.



Figure A1: Approximate extent of Kimpton Vale landholding in red

A portion of our client's lands, totalling c. 9.4 hectares, was previously subject to an application for a Strategic Housing Development application to An Bord Pleanála under ABP Reg. Ref.: 302552-18. The development proposal comprised 267 residential units, retail units, offices, a childcare facility, and an innovation hub. The application was refused by order dated the 14th of December 2018 for three reasons relating to wastewater capacity in the area, the AA Screening submitted, and the provision of some residential units on lands zoned for open space provision.

Subsequent to this decision, a revised SHD proposal is undergoing preparation at present and has been subject to pre-application consultation with the Planning Authority and An Bord Pleanála. The tripartite meeting was undertaken in June 2019, and the Board's Opinion has been received, which related primarily to wastewater matters and unit mix within the development proposal.

It is now understood that funding has been committed for Irish Water to address wastewater (local issues only) and water capacity constraints in the area. On foot of this, and subject to the design team addressing any other points raised during the course of pre-application consultations, it is intended to proceed with a full final application to An Bord Pleanála for this important development which will mend the current gaps in the Kilcoole main street and provide a new high quality residential neighbourhood.

Current Policy Context

Under the Greystones – Delgany and Kilcoole LAP 2013-2019, the portion of our client's landholding which is subject to the current SHD pre-application process is zoned part residential, part town centre, and part open space.

