

[REDACTED]

From: [REDACTED]
Sent: 10 January 2020 12:03
To: 'Luke Martin'
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: Luke Martin [REDACTED]
Sent: 10 January 2020 10:14
To: Planning - Plan Review
Cc: Maria Lombard
Subject: County Development Plan Review

Dear sirs,

Please see attached submission on the current County Development Plan Review.

Kind regards,

Luke Martin
Planner
RPS | Consulting UK & Ireland
Innishmore, Ballincollig
Co. Cork P31 KR68, Ireland

[REDACTED]
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Our ref: CP-19001-CDP IP Submission

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Date: 10th January 2020

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

RE: COUNTY DEVELOPMENT PLAN REVIEW

Dear Sirs,

RPS is instructed by Cosgrave Property Group to make a submission on its behalf with regard to the Wicklow County Development Plan Review.

Cosgrave Property Group is the owner of zoned development lands at Fassaroe, Bray. Fassaroe is currently designated as a key new residential development zone for the county. Accordingly, Cosgrave Property Group wishes to make a brief submission in respect of the future core strategy of the County Development Plan and its associated population growth strategy.

Core Strategy and Population Growth Strategy

The Issues Paper advises that the core strategy of the new County Development Plan must demonstrate that the plan is consistent with national and regional policy in relation to the hierarchy of settlements and the setting of population targets, which in turn justify the amount of land zoned for residential and mixed-use zonings.

The Issues Paper in particular states that,

"it will be necessary to alter the designation, place in the hierarchy and the development strategy for the previously designated 'growth towns' of Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany, Newtownmountkennedy and Blessington to align with the new designations set out in the RSES. The RSES identifies Bray and Wicklow-Rathnew as key towns for the County; below this the County Development Plan will need to categorise towns into either 'Self-Sustaining Growth Towns' or 'Self Sustaining Towns' based on assessment criteria set out in the RSES."

Related to the implications of the RSES for the Core Strategy of the County Development Plan are its implications for population targets and population growth strategy. In this regard the Issues Paper makes note of the need to adjust previous population growth targets to be in line with the NPF. It identifies that the current County Development Plan 2016 – 2022 projects a population of 176,000 for the county by 2028,

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Our ref: CP19001

while the NPF has set a revised target for the county of 164,000 by 2031. The Issues Paper advises that this accordingly, *"will require a change in our population growth strategy going forward."*

It is submitted that alterations to the growth strategy in the new County Development Plan to achieve a reduction in the overall countywide population target should provide for reductions in the growth targets of the lower order growth centres, and not the Key Towns of Bray or Wicklow/Rathnew as designated in the RSES.

A review of the previously identified growth targets for the County as set out in the 2016 County Development Plan illustrate relatively large percentage growth targets for many of the smaller growth towns. The proportionate growth identified for Bray, the highest order town in the county, was lower than most of the other growth towns and significantly lower than the moderate and large growth towns.

As noted above, the Issues Paper identifies a need to change the growth strategy of the 2016 County Development Plan to align with the RSES. This means a reduced countywide target (164,000 compared with 176,00 previously) in a slightly longer horizon period (2031 compared with 2028). In this regard it is submitted that the high growth rates identified in the 2016 County Development Plan for the lower order growth towns are not consistent with the provisions of the RSES.

The overall Vision of the RSES is underpinned by a spatial framework that is focussed on:

- Consolidation of Dublin City and suburbs
- Key Towns of Swords, Maynooth and Bray
- Planned development of strategic development areas in Donabate, Dunboyne Leixlip and Greystones

On the basis of the foregoing, it is submitted that the population targets for Bray as provided for in the 2016 County Development Plan remain generally in line with the provisions of the RSES. Any county level reductions in population targets should be provided for in the lower order towns which will be redesignated as self-sustaining growth towns, self-sustaining towns and / or rural places as per the RSES. Any excess population target growth due to redesignation of the lower order towns should be provided for in the Key Towns of Bray and Wicklow/Rathnew in line with the provisions of the RSES.

Compact Growth and Housing Policy

As part of the endeavours to reach the population targets set out in the RSES, the Issues Paper also notes the mandate for compact growth set out in the NPF. Within this, there is a national goal to provide 30% of all new homes within the existing built up footprints of settlements. The Issues Paper notes that this applies to all scales of settlements within the County, from large towns to villages and advises that this will require making better use of underutilised land including infill and brownfield sites.

With regard to 'Housing Policy' the Issues Paper identifies that the County Development Plan will have to put in place provisions to ensure that there is enough zoned and serviced land, in the right locations, to meet the needs of the future population of the County. The Issues Paper advises that for the larger towns, which have their own stand-alone Local Area Plans, the County Development Plan will indicate how much zoned land is required in these towns.

In this regard, it is submitted that the existing planning framework for Bray as set out in the Bray MD LAP 2018 already provides for population growth for Bray to 40,000 persons by 2028. The LAP strategy provides that land is available at appropriate locations capable of meeting the housing needs of the targeted population of the settlements in the MD.

It is further submitted that the provisions of the current Bray MD LAP complies with the requirements of the NPF with regard to compact growth and densification of existing built up areas rather than reliance on greenfield expansion only. In this regard, it is noted that in the course of preparing the 2018 LAP, Wicklow County Council reviewed growth options for the town including opportunities for increasing development and densities within the existing built up area. As stated in the Bray MD LAP:

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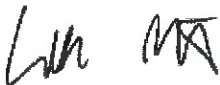
“As the majority of the lands in the town are ‘built out’ and very few ‘greenfield’, ‘brownfield’ or vacant sites remain, all such possible sites have been identified and re-evaluated in this plan, to achieve the maximum level of infill development possible in the town core; for example with respect to new housing, the plan provides that 35% of all new housing is targeted to occur on such sites, including 1,000 units on the former Bray golf club”

Thereafter, the LAP identifies the need for greenfield expansion of the town beyond its existing built up area to accommodate growth targets in line with its strategic role as the Key growth centre for the county.

In this regard, it is submitted that the provisions of the current Bray MD LAP, in terms of its identified locations and quantum of zoned lands for future development, are already in line with the principles of development set out in the RSES and NPF. Accordingly, it is submitted that the provisions of the new County Development Plan should be consistent with the development strategy for Bray as already set out in the Bray MD LAP.

We trust that this submission will be taken into consideration as the Development Plan formulation process continues, and we look forward to engaging further with the Council in due course in respect of the Development Plan preparation.

Yours faithfully,



Luke Martin
Planner