



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
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Topic

Compact Growth - Housing – Population Growth

Submission

On behalf of our client Glenveagh Homes Ltd. Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co Kildare we wish to make a submission on the Bray Municipal District Local Area Plan Issues Paper, published on the 20th of November 2024 ("Issues Paper") attached below.

File

Glenveagh Homes Ltd. Submission to Bray MD LAP Issues Paper.pdf, 0.3MB

Bray MD LAP,
Administrative Officer, Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67FW96

Date: 18th December 2024

Our Ref: RK 24356

Dear Sir/Madam,

RE: FORMAL WRITTEN SUBMISSION – BRAY MD LAP ISSUES PAPER

1.0 INTRODUCTION

On behalf of our client Glenveagh Homes Ltd. Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co Kildare we wish to make a submission on the Bray Municipal District Local Area Plan Issues Paper, published on the 20th of November 2024 ("Issues Paper").

Glenveagh is an Irish homebuilder who deliver high-quality new homes with an emphasis on high-quality design, innovation, sustainability, and people friendly communities. In this regard Glenveagh are uniquely positioned to help address the chronic housing shortage due to their ability to deliver large quantities of new homes in an efficient manner.

Glenveagh Homes are active within the LAP boundary: currently constructing a residential development as well as a creche.

Glenveagh Homes welcome the publication of the Issues Paper and support the need for a new local area plan to guide the future development of the Key Town of Bray.

Set against the backdrop of significant and sustained increases in population, a range of forecasts of higher than anticipated housing demand, as well as the increased annual housing target of 50,000 dwellings in the updated draft NPF, the publication of the Bray MD LAP Issues Paper provides an important opportunity for the Council to reflect the more up-to-date position of identified population growth and housing needs in 2025 following the publication of the 2022 census data from the Central Statistics Office and the Draft NPF (and associated updated population figures). It is essential that this population growth is reflected in the quantum of zoned residential lands made available to provide for new family homes within the boundaries of the Bray MD LAP lands.

2.0 SUMMARY OF KEY RECOMMENDATIONS AND PRINCIPAL POINTS OF SUBMISSION

Glenveagh Homes Ltd., welcome the preparation of the Issues Paper for the Bray MD LAP. This is an important policy document for the future development of Bray which is a Key Town in the RSES for the EMRA.

REVIEW OF HOUSING NEED ESTIMATES AND POPULATION FORECASTS

NPF Update 2024

The Revised NPF 2024 now plans for a population of 6.1 million by 2040 and a target delivery of 50,000 homes per annum. This means that the NPF will now need to plan for a population of 6.1 million by 2040, an additional 250,000 people over that planned for in 2018. The increase in population projections over the 2018 NPF effectively require nearly a doubling of households compared to the 2018 NPF. This results in an underestimation of c. 150,000 persons (or some 60,000 dwellings) expected to reside within the Eastern and Midland Region as currently published in the NPF (2018). This we submit is the baseline or minimum expectation for population increases in the region.

Ireland's population increased by 387,274 (or 1.312% year-on-year) between Census 2016 and Census 2022 – if this growth rate were to continue, it would result in a total national population of c. 6.51 million people by 2040, equating to an increase of 1.36 million people on the 2022 census. This compares to an annual rate of 0.95% for the draft NPF revision. Under this assumption, the population in 2040 would be c. 411,000 people higher than provided for in the draft NPF revision (or some 164,000 additional homes using 2.5 per household as a benchmark).

As such, notwithstanding the uplift from 33,000 pa to 50,000 pa in the draft NPF, this still represents a significant shortfall in the required number of dwellings. There are various independent sources identifying the shortfall in targets by Government to date, which are briefly referenced below and suggest a potential further increase in unit requirement to that presented in the current draft NPF.

Housing Commission Report 2024

The Housing Commission report for instance estimates that an additional 1,098,000 to 1,791,000 homes will be required up to the year 2050 on top of the existing c. 1.8 million residential units in the State as of Census night 2022. These increases translate to approximately 42,231 to 68,884 new residential completions required per annum. Therefore, the proposed housing target of the draft NPF revision at 50,000 homes per year is considered to be at the lower spectrum of target assumption in comparison to the projections of the Housing Commission regarding the required national housing output

The Housing Commission has estimated that, as of the 2022 Census, there was a housing deficit of between 212,500 and 256,000 homes. This housing deficit has not been taken into account in any population forecasts in any meaningful way to date. The HCR sets out that *“as of April 2022, the best estimate of Ireland's housing deficit was between 212,500 and 256,000 homes. For the remainder of this section, we take the (rounded) mid-point of this range, a deficit of 235,000 dwellings, as the baseline, in instances where a distinction between the housing deficit and future housing requirements is appropriate.*

Given this substantial deficit, equivalent to over 10% of households, policies and targets for future housing output must include a period of accelerated housing delivery. A process to urgently increase the supply of housing output should be pursued to eliminate Ireland's housing deficit and proactively raise the sector's capacity. (JSA Emphasis)

Housing Need Demand Assessment Model

The Housing Commission is of the view that *“the HNDA methodology is in principle the correct one, but that its application in the Irish context has been problematic due to the key parameter inputs used.*

A particularly noteworthy aspect of the application of HNDA in an Irish context has been the inappropriate referencing of HNDA results to argue for a cap on housing development in particular localities. By contrast, in Scotland HNDA results are widely understood as being the minimum level of housing supply that is needed.” (JSA Emphasis)

It is submitted that a key failing of HNDA model is that it does not take into account unmet demand from under-construction and rates of homelessness, as well as the pent-up demand which have been evident for over a decade. It is important that the new LAP for the Key Town of Bray acknowledges the pent-up demand and that the figures used in the application of zoning land in the LAP area focuses on delivery of housing units rather than the application of an arbitrary cap.

Recent CSO Projections

On the 27th of August, the CSO published population and migration estimates in the 12 months to the end of April 2024, which outlines that the population in Ireland rose by 98,700 people which was the largest 12-month increase since 2008.

The CSO (Population and Migration Estimates – August 2023 and 2024) estimates that the population of the State increased by c. 196,300 people (or 3.7%) between April 2022 and April 2024.

Published in July 2024 by the CSO, the Population and Labour Force Projections release looks at three different potential population growth scenarios over the time period of 2023 – 2057. The resident population estimate based on Census 2022 was 5,183,966 persons and this is projected to grow significantly under the three projection scenarios to 2057. over the 35-year period to 2057, from between 5.73 million people to 7.01 million people in 2057.

ESRI Population Projections the Flow of New Households and Structural Housing Demand' (2024)

The population figures produced in the ESRI publication, *‘Population Projections the Flow of New Households and Structural Housing Demand’* (2024) underpin the population projections used in the Draft Revised National Planning Framework.

The ESRI report acknowledges that: ***“many previous population scenarios for Ireland have underestimated population growth over the short term. Net migration is the key driver of population change in Ireland and net migration flows have been very strong in recent years.”***

The ESRI report outlines that Ireland has experienced rapid population growth in recent years, both compared to historical experience and relative to the EU. Census 2022 data reveals that the population was 5.184 million, having increased by 422,000 or by 9 per cent since 2016. This rate of growth is comparable to the long-run population growth over the past 25 years.

Perhaps the most critical and noteworthy aspect of the ESRI report is that it deals with 'structural demand' – which is future demand based on population growth and the report makes it clear that it does not consider existing pent-up housing demand of c. 235,000 which the Housing Commission identified in their report. In other words, the deficit issue needs to be considered appropriately in setting revised and increased national targets in the NPF. It is welcome that the Draft NPF Revision explicitly recognises this issue, and it is submitted that a reasonable timeline needs to be established to address this deficit in addition to the future population growth, and for it to be clearly quantified.

Other Estimates of Housing Need

According to the Davy June 2024 Commentary, Ireland needs to build almost 85,000 new homes a year to address the structural shortfall in housing and the expected population growth over the next 10 years. The report notes that the number of housing units per adult at 0.51 (in 2022) is lower than the average of 0.61 units per adult for other European countries and that 85,000 units per annum would be required to reach the midpoint of 0.55 units per adult (by 2030).

Davy said it expected the Republic's population to grow to 5.9 million by 2030, which would be 524,000, or 10 per cent, ahead of the Government's National Planning Framework (NPF) baseline of 5.36 million, noting *"This forecast has significant implications for housing demand over the coming years,"*

Davy estimates that:

*"While national income was expected to grow in the next two years, **the level of housing output recorded in 2023 will need to be more than doubled if the population reaches 5.9m by 2030 in line with the financial services firm's estimates.**"* (JSA Emphasis added)

REDUCTIONS IN RESIDENTIAL LAND SUPPLY (GOODBODY SEPTEMBER 2024)

According to Goodbody the eastern and midlands region of the Republic has a shortage of residential zoned and serviced land to meet development needs over the next six years to the tune of 40,000 to 70,000 units.

The key eastern and midlands region, which includes Dublin and surrounding counties, accounts for only 34% of the available zoned land, but 48% of households.

Goodbody¹ outlines that there is insufficient zoned serviced land in the eastern and midlands and southern regions to meet updated housing supply targets as per updated NPF over six years. In addition, Goodbody estimates that there is a need for as many as 60,000 units a year over this period to deal with an existing shortfall of supply as well as forecast population growth.

¹ [goodbody_residential-land-availability-report_sept24.pdf](#)

We strongly support the conclusion of the report that there is a significant shortfall in the amount of zoned land in Ireland, particularly in the Midland and East Region. In this regard it is submitted that the level of zoned land is severely underestimated for the County of Wicklow, including the key town of Bray.

Having regard to the critical need for housing it is recommended that the future LAP for the Key Town of Bray does not reduce the quantum of zoned land or place order of priority of zoned lands so as to render some lands as effectively dezoned. It is key that there is sufficient flexibility for the Council to meet the challenge of delivering sufficient numbers of dwellings in Bray so that the Council meets its requirements regarding the delivery of much-needed housing.

HOUSEHOLD SIZE AND THE LAP

In tandem with population growth, one of the key informers to determine the estimated number of houses required in the county and in turn, in Bray, is household size. It is respectfully submitted that use of the average household size of 2.7 people within the Wicklow County Development Plan 2022-2028 has resulted in a failure to adequately assess and provide for the existing significant housing shortfall in the County and accordingly, in Bray (as identified in 2022). It is essential that the drafting of the new LAP considers the actual household size as recorded in the 2022 census.

Census 2022 indicates a population of 155,851 and 59,629 no. households for County Wicklow (2.6 persons per household). While the population growth is broadly in line with the 2016 plan target, housing provision has fallen short of that required by the 2016 Plan to meet the needs of this expanded population. The shortfall between the target housing stock (in the 2016-2022 Wicklow CDP and the actual no. of dwellings recorded in the Census 2022), is some 10,193 dwellings. No provision is made in the 2022-2028 CDP Core Strategy for the identified and necessary housing to meet this shortfall.

It is therefore vitally important that the adopted LAP considers the most up to date and relevant population and housing data available rather than relying on projections from the Development Plan which fall drastically short of what is required.

The use of average household size of 2.7 people has resulted in a failure to adequately assess and provide for the existing significant housing shortfall in the County as of 2022

Having regard to the above, it is recommended that the LAP takes into account lower household figures (2.3) in calculating the number of units for Bray as well as accounting for low activation rates as observed over the period 20180-2024.

DEVELOPMENT PLAN GUIDELINES 2022 (DPGS)

Section 4.3 of the DPGs recognise the difficulty in managing medium and long-term planning and incorporating population targets into the 6-year statutory development plan cycle.

We would highlight that the DPGs confirm that it is not the intent of the planning system and the development plan process *“to facilitate the hoarding and speculation of serviced development land.”* The Development Plan Guidelines further recognise that *“there is a*

need for some degree of competition and choice in the residential development land market.”

Having regard to the above, it is important that the LAP does not unduly constrain the delivery of housing and that the new plan incorporates ‘*additional provision*’ of zoned residential lands to appropriately reflect activation and completion rates of these sites, allow for sufficient development choice during the plan period and for any potential unprecedented and inflated population growth into the future, as provided for by the Development Plan Guidelines.

However, even with the provision of 20-25% excess or headroom is well short of what is required to enable housing need to be met within a 6-year plan period. A headroom of at least 50% is more appropriate having regard to typical activation rates, of less than 10% as evidenced for the Key Town of Bray over the period 2018-2024. This can only be addressed by maintaining the current quantum of land for ‘*new residential*’ in the Draft LAP.

THE PROVISION OF ZONED LANDS IN THE BRAY MD LAP

There is an existing significant shortage of serviced zoned lands in the region. As such there should be no removal of residentially zoned lands in the forthcoming Local Area Plan. The Core Strategy should not unduly restrict the delivery of housing in the key town of Bray. Housing targets should not be applied as strict caps on housing delivery, instead The Council should encourage development at an appropriate scale and suitable locations in accordance with the principles of the NPF and RSES. On this basis it is vital that a buffer of at least 50% should be applied to available land requirements.

A principal concern of our client with a future LAP for the key town of Bray is that the commentary contained in Table A of Chapter 3 of the CDP which indicates that some 40 hectares of land outside the existing built-up area is to be “addressed in next LAP – comprises strategic sites”, would result in a reduction in new residential zoned land within the key town of Bray.

LOW ACTIVATION RATES

Based on experience, activation rates of zoned land translating into completed housing over a typical 6-year plan period is typically to 20-40% of zoned land range nationally meaning that there may be a 60-80% shortfall in housing delivery and a consequent lack of housing delivered during the plan period. Therefore, the amount of zoned land needed to deliver on population projections needs to take into account the historically low activation rates of zoned land. The activation rate of completed homes in Bray is even lower.

We refer the Planning Authority to the recent report by Goodbody research which demonstrates that actual activation and housing completion rates are far below 75% of all zoned land in a 6-year period. It is noted that Wicklow County Council secured only 20% activation of zoned land over the last CDP period 2016-2022. Therefore, the CDP clearly does not meet this key requirement to ensure that the CDP core strategy has made adequate provision for zoned and serviced sites that will come forward during the lifetime of the plan.

Table A of the Wicklow County Development Plan 2022-2028 identifies a capacity of 6,500 units on existing zoned lands for the key town of Bray. The Bray MD LAP 2018-2024 identifies some 132 hectares of zoned land in a mixture of existing, new residential and mixed-use land use zoning objectives.

It is clear from Table A and a review of Table 3.1 of the Bray MD LAP 2018 as well as the Wicklow County Council Planning Portal, that while there has been some activity and construction of units within the timeframe of the LAP, notably at the following sites SLO1, SLO 3 and SLO9, the percentage of completed units c. 550 unit is approximately 8% of the overall figure of c. 6,500 units identified in the 2018 LAP.

The LAP should include sufficient residential zoned lands to account for an appropriate headroom reflective of current activation rates for residential zoned land over development plan periods. Development plans should include a headroom of 75% or at a minimum 50% headroom as per NPO no. 48.

A principal concern of our client with a future LAP for the key town of Bray is that the commentary contained in Table A of Chapter 3 of the CDP which indicates that some 40 hectares of land outside the existing built-up area is to be “*addressed in next LAP – comprises strategic sites*”, would result in a reduction in new residential zoned land within the key town of Bray.

It is noted that the Minister for Housing, Local Government and Heritage in a letter dated the 11th of July 2024 (see Appendix 1) to the Local Authority Chief Executives around the Country outlining the updated population figures in the NPF and that an average of approximately 50,000 new housing units per annum will be needed to meet our needs over the coming years.

An important facet of reaching that level of output is ensuring that there is sufficient zoned and serviced land available at suitable locations to facilitate the development of housing and sustainable communities.

*Any future proposals relating to the zoning of land must be evidenced-based, justified, and consistent with relevant national and regional development policy. In this regard, I would note that the assessments should have regard to the quantum **and rate of take-up of zoned and serviced land on the one hand, and suitability on the other**, taking account of the settlement hierarchy; servicing requirements and transport accessibility..” (JSA emphasis added).*

Having regard to the observed activation rate for the Key Town of Bray, it is respectfully submitted that there is no dezoning or phasing of zoned land within the LAP boundary. Moreover, having regard to the above, it is important that the LAP does not unduly constrain the delivery of housing and that the new plan incorporates ‘*additional provision*’ of zoned residential lands to appropriately reflect activation and completion rates of these sites, allow for sufficient development choice during the plan period and for any potential unprecedented and inflated population growth into the future, as provided for by the Development Plan Guidelines.

We would note that under Section 95 (1) of the Planning Act 2000 (as amended), planning authorities are obliged to:

*“ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy **and to***

ensure that a scarcity of such land does not occur at any time during the period of the development plan.” (emphasis added).

We trust this submission is helpful to the Planning Authority and Glenveagh Homes Limited look forward to the publication of the LAP in due course.

Having regard to the above, it is respectfully submitted that there is no dezoning or phasing of zoned land within the LAP boundary.

3.0 CONCLUSIONS

Glenveagh Homes Ltd., welcome the preparation of the Draft Municipal District LAP for Bray and the Issues Paper. This is an important policy document for the future development of Bray which is a Key Town in the RSES for the EMRA.

It is respectfully submitted that the final Bray LAP 2025 takes into account this submission in respect of providing an appropriate quantum of zoned residential lands to provide for much needed additional housing in the key town of Bray.

Yours sincerely,



John Spain

Managing Director John Spain Associates Ltd.