



# Wicklow Town - Rathnew LAP Submission - Report

<b>Who are you:</b>	Agent
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<b>Reference:</b>	WRLAP-111313
<b>Submission Made</b>	September 28, 2023 11:17 AM

## 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 Pre-Draft Wicklow-Rathnew Local Area Plan 2024-2030 (the "Issues Paper").

Please see attached Glenveagh Homes Ltd., submission in respect of compact growth

## File

23123\_Glenveagh Submission to Wicklow Rathnew Issues Paper FINAL.pdf, 0.93MB

Wicklow Town – Rathnew LAP,  
Administrative Officer, Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67FW96

Date: 28th September 2023  
Our Ref: RK/MN 23123

Dear Sir/Madam,

**RE: FORMAL WRITTEN SUBMISSION – PRE-DRAFT – WICKLOW-RATHNEW LOCAL AREA PLAN 2024**

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 Pre-Draft Wicklow-Rathnew Local Area Plan 2024-2030 (the “*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 welcome the publication of the Issues Paper which will inform the Wicklow-Rathnew LAP 2024 and support the need for a new local area plan to guide the future development of Wicklow-Rathnew. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out the following objectives for the town:

- *Wicklow Town - Rathnew is designated as the Level 2, ‘Key Town’ within the Core Region; a large economically active service town and county town, with high quality transport links and the capacity to act as a growth driver to complement other growth centres in the region.*
- *Wicklow Town is serviced by rail and bus and is located on the N/M11 strategic transport corridor. Wicklow port is of regional significance.*
- *There is a population allocation of c.18,500 persons for 2028 (from a population of c.14,100 persons in 2016).*

The Issues Paper states that; “*Wicklow Town – Rathnew will need c. 1,500 new homes built between now and 2031*”.

It is respectfully submitted that, the number of new homes required has been vastly underestimated and needs to be addressed in the draft Wicklow-Rathnew LAP. The publication of the pre-draft LAP provides an important opportunity for the Council to reflect the more up-to-date position of identified population growth and housing needs in 2023 following the

publication of the 2022 census data from the Central Statistics Office. 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 LAP lands.

## **SUMMARY OF KEY RECOMMENDATIONS AND PRINCIPAL POINTS OF SUBMISSION**

Glenveagh Homes Ltd., welcome the preparation of the reviewed Wicklow-Rathnew Local Area Plan 2024. This is an important policy document for the future development of Wicklow-Rathnew which is a Key Town in the RSES for the EMRA.

The focus for the LAP, should in the first instance be on consolidation of the urban form of Wicklow-Rathnew in accordance with NPF policy objectives on compact growth. In this regard it is recommended that the focus for the consolidation of the overall LAP area should be the sequential development of Wicklow town from east to west, in proximity to existing schools and services, rather than more peripheral areas of Rathnew (with fewer services).

The 'Population and migration estimates for April 2023' were published on the 25<sup>th</sup> of September 2023 by the CSO. The CSO state that

*"Ireland's population was estimated to be 5.28 million, rising by 97,600 people in the year to April 2023. This was the largest 12-month population increase since 2008 when the population rose by 109,200."*

Clearly the figures in the NPF are significantly out of date and do not reflect the much higher than anticipated population growth in recent years and the onus is on Planning Authorities to plan for future growth, particularly in locations with access to sustainable transport, education, and services.

It is noted that the 2016-2022 County Development Plan set out a target population for 2022 of 158,000 and target housing stock of 69,822 (source: Housing Strategy 2022 CDP - which implies an average household size of 2.26 used at the time). Census 2022 indicates a population of 155,851 and 59,629 no. households for County Wicklow (2.6 persons per household).

The use of an average household size of 2.7 people for future housing targets results in a failure to adequately provide for the actual housing needs of the county up to 2028 and beyond & therefore does not account for existing significant shortfall for the existing population.

Using 2.7 persons per household is a significant issue for a well-functioning economy which needs a range of housing typologies and sizes to cater for the existing population (to allow for mobility between households) as well as providing much needed housing typologies for employees. Increasingly a key concern for inward investment is the availability of suitable housing. Using the higher 2.7 figure in the Wicklow Rathnew LAP will reinforce the issues relating to "crowding" outlined above and also have the potential to reduce investment in employment opportunities in the key town of Wicklow.

The preparation of the LAP will require an assessment of infrastructure capacity and a cost analysis of the different options and strategies for zoning. A tiered approach, in accordance with the requirements of the Development Plan Guidelines (2021), will be required. Tier 1 comprises lands that are able to connect to existing development services and generally positioned within or contiguous to the built-up area. Tier 2 relates to lands not yet serviced, but which may be capable of being serviced over the period of the

Plan. A step-by-step approach to identifying appropriate tiers of zoned land should be adopted in accordance with the provisions of the Development Plan Guidelines.

The lands to the east of the current footprint of Wicklow are an appropriate location/focus for consolidation of Wicklow, particularly the areas noted as strategic land bank as part of the previous Plan for the area. Consolidation of the urban form at this location would avoid leapfrogging of development to other more peripheral areas of the overall settlement, avoiding unnecessary longer trips to the centre of Wicklow town with its higher level of services and amenities (compared to Rathnew village centre).

The strategic consolidation of urban development to the west of Wicklow town in the first instance (as set out in Map 1 Extract) is sequentially preferable and in accordance with the sequential approach set out in the Development Plans – Guidelines for Planning Authorities (June 2021) and likely to be very cost effective to service (as Tier 1 lands) as existing cycling, footpath and road infrastructure is in place and can be easily serviced as well as providing additional north south links.

We recommend that a focus on consolidation of Wicklow town within the wider LAP boundary will result in the effective use of existing infrastructure on serviced land in accordance with the proper planning and sustainable development of the area.

The achievement of the core strategy figures in the CDP is dependent on lands at Fassaroe which require significant infrastructure upgrades as detailed above. Noting the significant infrastructural requirements outlined above, it could be argued that the lands in Fassaroe are not Tier 2 lands and should not be included in the core strategy figures. The key town of Wicklow-Rathnew has existing serviced lands which could be brought forward to ensure that sufficient land is zoned and capable of being delivered within the timeframe of the CDP and Core Strategy.

It is noted Section 95 (1) of the Planning and Development Act 2000 (as amended), planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, to meet the requirements of the housing strategy and to ensure that a scarcity of residential land does not occur at any time during the period of the plan. The onus is on the Local Authority to ensure that there is sufficient housing supply and zoned lands.

Given the 'Key Town' designation of Wicklow-Rathnew, coupled with its strategic location and access to public transport and the documented increased population growth experienced from 2011 until the present day, it is respectfully submitted that the town can cater for an increased number of houses than proposed in the Core Strategy and the Issues Paper. This is a fundamental issue which needs to be addressed with the most up to date population information available. The failure of the draft-LAP to address this matter will exasperate the shortfall of housing already being experienced in the area, as evidenced by the 'house-crowding' documented in the 2022 Census.

It is respectfully submitted that the draft Wicklow-Rathnew LAP 2024 must incorporate the most recent and up to date information available in the form of the CSO 2022 Census data and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing.

## 1.0 ISSUES PAPER – REVIEW AND KEY CONSIDERATIONS

### 1.1 POPULATION GROWTH

The Issues Paper identifies a requirement for 1,500 new homes in Wicklow-Rathnew over the next 6 years. This requirement has derived from the population projections contained within the National Planning Framework 2018. It is respectfully submitted that it is particularly important to factor in actual population growth rates which have occurred since the preparation of the NPF which is based on the 2016 census data.

The NPF predicts that population growth nationally will grow by 900,000 from 2016 at an average annual rate of c. 0.9%, however noting the higher level of in migration, the framework sets out a target to accommodate a population increase of 1.1m by 2040 with an average growth rate of 0.96% p.a. over the 24 year period.

The recent publication of the 2022 Census data has shown that for the first time in 171 years, Ireland's population has exceeded the five million threshold, reaching 5,149,139 people, an 8% increase since April 2016. This is a growth rate of approximately 1.3% annually over the 6 year period.

Co. Wicklow itself has experienced a population increase of 9.2% from 2016. The 2022 census recorded a population of 155,485 within the county. This is a growth of approximately 1.5% per year since the last census which is above the average population increase experienced nationally.

When looking at the Wicklow-Rathnew area specifically, a review of the census population data from 2011, 2016 and 2022 shows that inter-census population growth has exceeded that of the overall county average. For example, the population of Wicklow-Rathnew increased by 17.8% between 2016 and 2022. In comparison, the average population increase across the county was 9.4%. The increase experienced in Wicklow-Rathnew is almost double that averaged across the county. This demonstrated increase in population has resulted in a direct demand of increased housing provision within the LAP lands. It is submitted that the 1,500 units identified within the Issues Paper will not meet demand. Accordingly, it is submitted that additional residential zoned lands will be required.

#### **Population and Migration Estimates, April 2023 – Published 25<sup>th</sup> September 2023**

The 'Population and migration estimates for April 2023' were published on the 25<sup>th</sup> of September 2023 by the CSO.

In the 12 months to the end of April 2023 the CSO estimate that:

*The population rose by 97,600 people which was the largest 12-month increase since 2008.*

*There were 141,600 immigrants which was a 16-year high. This was the second successive 12-month period where over 100,000 people immigrated to Ireland.*

The report sets out that:

- Estimated population was 5.28m, an increase of 97,600 in 12-months. The largest 12-month increase since 2008.

- 141,600 immigrants into the country, second highest on record (151,100 in 2007), with net migration of 78,000 (again second highest on record with 2007 being 104,800)
- 64,000 emigrants, 14% increase year on year and highest since 2016.
- Amongst Irish citizens, negative net migration of -900. Second successive year of negative net Irish migration. Between 2017 and 2021, each year saw positive Irish net migration.
- Natural Increase (Births minus Deaths) was 20,000, its lowest level since 1997.

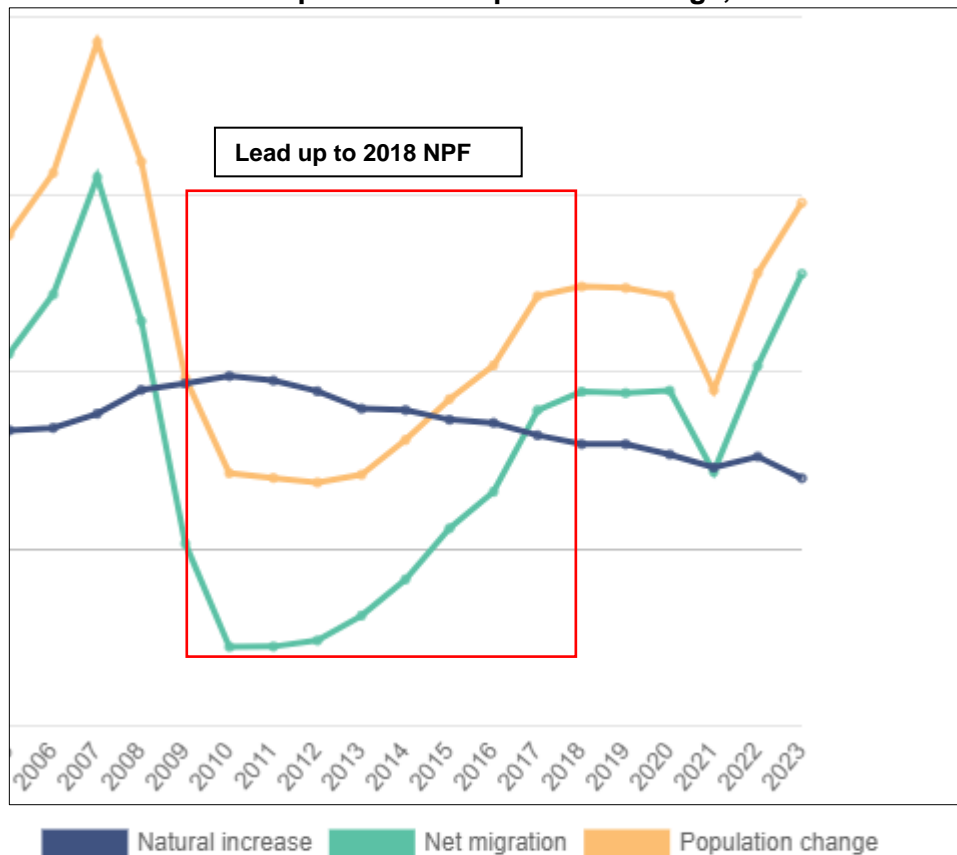
The CSO state that

*"Ireland's population was estimated to be 5.28 million, rising by 97,600 people in the year to April 2023. This was the largest 12-month population increase since 2008 when the population rose by 109,200."*

The publication of the NPF was based on a trend of population growth which was framed by lower population increases than has been apparent for the past number of years, with low levels of net migration and lower levels of population change. It is submitted that the population growth is above the higher end estimates included in the NPF Implementation Road Map.

Clearly the figures in the NPF are significantly out of date and do not reflect the much higher than anticipated population growth in recent years and the onus is on Planning Authorities to plan for future growth, particularly in locations with access to sustainable transport, education, and services.

**Table 1: Annual Components of Population Change, 1988 – 2023**



Source: Population and Migration Estimates, April 2023

## 1.2 EXISTING HOUSING SHORTFALL

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 Wicklow-Rathnew, 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, the Wicklow-Rathnew (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.

The CSO recorded that in April 2022 in Wicklow, 17,090 adults, or 15% of all those aged 18 and over in the county, were still living with their parents<sup>i</sup>. This was an increase of 2,389 (16%) since 2016. Nationally, 13% of adult children aged 18 years and above were recorded as living with their parents. In 2022, 24 was the youngest age at which the majority of people nationally were not living with their parents. In Wicklow this was 27 years. This demonstrates that there are increased numbers of young people being forced to remain at home as a direct result of a lack of available housing to move into.

The 2016-2022 County Development Plan set out a target population for 2022 of 158,000 and target housing stock of 69,822 (source: Housing Strategy 2022 CDP - which implies an average household size of 2.26 used at the time).

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 new 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.

As reflected in the 2022 census data and discussed above, the under-performance in the actual delivery of housing stock has led to over-crowding i.e., more people living in houses where they do not wish to (adult 'children' staying in the family home, single people 'house sharing' for example). It is noted that the Housing Strategy (Appendix 3 of the Development Plan) recognises that; *"The slow growth of housing stock compared to rates of population growth and household formation has led to an increase in the average number of persons per household to around 2.8 in the Region, based on the 2016 census, which saw a reversal of the long-term decline in the average household size."*

Notwithstanding this recognition, the housing needs projections in the 2022-2028 CDP do not take account of this very significant shortfall in housing units in 2022 of some 10,193 dwellings. Accordingly, it is critical that the preparation of the LAP takes account of this shortfall and seeks to increase the supply of housing in Wicklow-Rathnew, which is identified as a 'key town' and therefore capable of accommodating increased growth.

When looking at the composition of private households in Wicklow between 2011 to 2022, a review of census data shows that households comprised of unrelated persons only (house sharing) increased by over 70% over this 11 year period. This would suggest increased affordability constraints and undersupply in the housing market as adults are required to

share accommodation to find/afford appropriate housing. Despite only comprising 2% of all private households in Wicklow in 2022, households comprised of unrelated persons constituted 10% of total household growth between 2011 and 2022. This is significant when considered in the context of the identified population growth in the area.

It is further noted that the 2022 census identified 41,277 families in Wicklow in April 2022, which is an increase from 38,495 (+7%) in 2016. Again, this demonstrates the need for increased housing provision for families within Wicklow-Rathnew, a identified Key Town.

There is a demonstrated need to provide further housing across the LAP lands to address the shortfall evident within the county. This must be reflected in the provision of appropriately zoned residential lands to meet actual demand within the LAP boundaries.

**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**

The CDP does not provide a meaningful assessment on the existing shortfall in housing in the County, as evidenced in particular by the high average household size of 2.86 people in 2016 Census (2.84 in the 2022 Census). Future housing needs are projected on future population growth. This approach has resulted in very significant under provision for future housing for the existing and planned future population.

This arises as the methodology used in respect of “*unmet demand*” and homelessness gives a figure of just 150 units (contained in table 2.6 of the Housing Strategy), which is considered to be significantly underestimated. This appears to assume that an average household size of 2.7 is acceptable, or normal, and ignores the issue of ‘house crowding’, as termed by the CSO. The National Planning Framework forecasts an average household size of 2.5 by 2040. This is also considered high by western European norms and builds in ‘house crowding’ nationally for the future. For example, the figure for France is 2.2, in Germany it is 2.0 and in Belgium and Italy it is 2.3. The long-term trend of declining average household size in Ireland from 1966 (4.0) to 2011 (2.73), was reversed for the first time in 2016 (2.75). It was at 2.73 in 2022. This reversal has arisen as a result of housing shortages nationally, and the position is most acute in the Greater Dublin Area, which has the highest housing shortfalls and the highest average household sizes.

It is noted that the 2016-2022 County Development Plan set out a target population for 2022 of 158,000 and target housing stock of 69,822 (source: Housing Strategy 2022 CDP - which implies an average household size of 2.26 used at the time). 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 well 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 2002-208 Plan Core Strategy for the identified and necessary housing to meet this shortfall.

The under-performance in the actual delivery of housing stock has led to over-crowding i.e., more people living in houses where they do not wish to (adult ‘children’ staying in the family home, single people ‘house sharing’ for example). It is noted that the Housing Strategy (Appendix 3 of the Development Plan) recognises that : “*The slow growth of housing stock compared to rates of population growth and household formation has led to an increase in the average number of persons per household to around 2.8 in the Region, based on the 2016 census, which saw a reversal of the long-term decline in the average household size.*” Notwithstanding this recognition, the housing needs projections in the 2022-2028 CDP do



not take account of this very significant shortfall in housing units in 2022 of some 10,193 dwellings. The projections in the Plan are therefore contrary to Government policy on meeting housing needs such as in *'Housing for All'* (2021).

The application of a 2.7 persons per household is a significant issue for a well-functioning economy which needs a range of housing typologies and sizes to cater for the existing population (to allow for mobility between households) as well as providing much needed housing typologies for employees. Increasingly a key concern for inward investment is the availability of suitable housing. Using the higher 2.7 figure in the Wicklow Rathnew LAP will reinforce the issues relating to "crowding" outlined above and also have the potential to reduce investment in employment opportunities in the key town of Wicklow.

**The use of an average household size of 2.7 people for future housing targets results in a failure to adequately provide for the actual housing needs of the county up to 2028 and beyond.**

The application of a 2.7 persons per household average, compounds this position and will ensure that house crowding continues into the future for the forecasted additional population as well as for the existing population. It reduces the number of units potentially required in the projections below that actually required to meet housing need. The high average household size of 2.7 is indicative of a planned continuation of 'house crowding' into the future. This arises from a significant shortfall in housing to meet the needs of the existing population. The use of 2.7 average household size means that the housing need for the forecasted population to 2028 and 2031 are significantly understated in the Core Strategy.

**Shortfall in residential zoned land**

The Plan follows the Development Plan Guidelines and Implementation Roadmap incorrect assumption that the great majority of the residential zoned land will be developed over the lifetime of the 6-year Plan with completed households – Table A of Core Strategy. This is not the case in reality, and any shortfall in the development of the lands which are zoned will result in a corresponding reduction in the development of housing units compared with the housing needs of the County.

In this regard, based on experience, completion rates of zoned land translating into housing is in the low 20-30% range meaning that if that continued to be the case (which is likely to transpire) then there would be a 70% shortfall in housing delivery and a consequent lack of housing delivered by Wicklow County Council which would be contrary to Section 95 (1) of the Act, planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, to meet the requirements of the housing strategy.

The Plan does not take into account the time it takes in practice for land to come forward, obtain planning permission, obtain funding and be constructed (which can occur over a number of plans). It is considered that insufficient 'headroom' was applied in this regard.

Appendix 9 of the Wicklow CDP "Infrastructural Assessment Report as altered" states that Fassaroe Tier 2: Strategic sites (Fassaroe and Golf Club) pending delivery of Transportation Infrastructure to support new development. The 2 no. "strategic sites" are classified as Tier 2 lands.

The assessment notes:

*"The tables are intended to inform but are not intended to be relied upon for development management purposes. The tables demonstrate that lands identified in the Core Strategy for residential development are either serviced (Tier 1) or have the potential to be serviced*

*within the lifetime of the plan (Tier 2). The full extent of requisite enabling infrastructure with regard to specific sites will continue to be assessed through the development management process.” (JSA emphasis).*

The achievement of the core strategy figures in the CDP is dependent on lands at Fassaroe which require significant infrastructure upgrades as detailed above. Noting the significant infrastructural requirements outlined above, it could be argued that the lands in Fassaroe are not Tier 2 lands and should not be included in the core strategy figures.

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 Wicklow-Rathnew and also takes into account the potential for non-delivery of the Key town of Bray due to acknowledged infrastructure deficiencies set out in Appendix 9 of the CDP.

### **1.3 DEVELOPMENT PLANS –GUIDELINES FOR PLANNING AUTHORITIES (JUNE 2021)**

While the submission relates to a Local Area Plan, the Development Plan Guidelines set out important guidance for the zoning, identification of land use strategies and phasing and sequencing of development. This is of relevance, as the local area plan is setting out the zoning framework and overall form of Wicklow-Rathnew.

A clear methodology is provided for the preparation of the housing demand and zoning requirements across all settlements within the planning authority area. In particular, a settlement capacity audit will therefore comprise housing estimates for tier 1 and tier 2 services lands.

The Guidelines note that *“It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.”*

It is submitted that the Map 1 Extract below provides appropriately located Tier 1 lands which could contribute towards the identified housing need for Wicklow-Rathnew.

### **2.0 SUBMISSION IN RELATION TO STRATEGIC CONSOLIDATION OF WICKLOW**

The figure below illustrates a strategic consolidation zone sequentially immediately adjoining the existing footprint of Wicklow town.

Consolidating future urban and residential development within the strategic consolidation zone identified in the figure will contribute to the following higher level policy objectives and population requirements to 2031:

- The consolidation of the area will contribute to meeting the housing growth target of c.1,500 from 2022 to 2031.
- It will contribute to compact growth and consolidation of the urban form of Wicklow, thereby contributing to sustainable development (NSO 1, NPO 3a and NPO33 of the NPF).
- The strategic consolidation lands are readily serviced by extension of existing services and are all accessible by road and cyclepaths/footpaths.

- Prioritisation of the area as tier 1 development lands would accord relevant policy provisions (Wicklow CDP Core Strategy and Development Plan Guidelines 2021)
- Wicklow Town - Rathnew is designated as the Level 2, 'Key Town' within the Core Region; a large economically active service town and county town, with high quality transport links and the capacity to act as a growth driver to complement other growth centres in the region.
- Wicklow Town is serviced by rail and bus and is located on the N/M11 strategic transport corridor. Wicklow port is of regional significance.
- There is a population allocation of c.18,500 persons for 2028 (from a population of c.14,100 persons in 2016).

**Map 1 Extract - Map showing existing zonings and strategic consolidation zone**



### 3.0 CONCLUSIONS

Glenveagh Homes Ltd., welcome the preparation of the reviewed Wicklow-Rathnew Local Area Plan 2024. This is an important policy document for the future development of Wicklow-Rathnew which is a Key Town in the RSES for the EMRA.

The focus for the LAP, should in the first instance be on consolidation of the urban form of Wicklow-Rathnew in accordance with NPF policy objectives on compact growth. In this regard it is recommended that the focus for the consolidation of the overall LAP area should be the sequential development of Wicklow town from east to west, in proximity to existing schools and services, rather than more peripheral areas of Rathnew (with fewer services).

The preparation of the LAP will require an assessment of infrastructure capacity and a cost analysis of the different options and strategies for zoning. A tiered approach, in accordance

with the requirements of the Development Plan Guidelines (2021), will be required. Tier 1 comprises lands that are able to connect to existing development services and generally positioned within or contiguous to the built-up area. Tier 2 relates to lands not yet serviced, but which may be capable of being serviced over the period of the Plan. A step-by-step approach to identifying appropriate tiers of zoned land should be adopted in accordance with the provisions of the Development Plan Guidelines.

The lands to the east of the current footprint of Wicklow are an appropriate location/focus for consolidation of Wicklow, particularly the areas noted as strategic land bank as part of the previous Plan for the area. Consolidation of the urban form at this location would avoid leapfrogging of development to other more peripheral areas of the overall settlement, avoiding unnecessary longer trips to the centre of Wicklow town with its higher level of services and amenities (compared to Rathnew village centre).

The strategic consolidation of urban development to the west of Wicklow town in the first instance (as set out in Map 1 Extract) is sequentially preferable and in accordance with the sequential approach set out in the Development Plans – Guidelines for Planning Authorities (June 2021) and likely to be very cost effective to service (as Tier 1 lands) as existing cycling, footpath and road infrastructure is in place and can be easily serviced as well as providing additional north south links.

We recommend that a focus on consolidation of Wicklow town within the wider LAP boundary will result in the effective use of existing infrastructure on serviced land in accordance with the proper planning and sustainable development of the area.

The achievement of the core strategy figures in the CDP is dependent on lands at Fassaroe which require significant infrastructure upgrades as detailed above. Noting the significant infrastructural requirements outlined above, it could be argued that the lands in Fassaroe are not Tier 2 lands and should not be included in the core strategy figures. The key town of Wicklow-Rathnew has existing serviced lands which could be brought forward to ensure that sufficient land is zoned and capable of being delivered within the timeframe of the CDP and Core Strategy.

It is noted Section 95 (1) of the Act, planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, to meet the requirements of the housing strategy and to ensure that a scarcity of residential land does not occur at any time during the period of the plan.

Given the 'Key Town' designation of Wicklow-Rathnew, coupled with its strategic location and access to public transport and the documented increased population growth experienced from 2011 until the present day, it is respectfully submitted that the town can cater for an increased number of houses than proposed in the Core Strategy and the Issues Paper. This is a fundamental issue which needs to be addressed with the most up to date population information available. The failure of the draft-LAP to address this matter will exasperate the shortfall of housing already being experienced in the area, as evidenced by the 'house-crowding' documented in the 2022 Census.

It is respectfully submitted that the draft Wicklow-Rathnew LAP 2024 must incorporate the most recent and up to date information available in the form of the CSO 2022 Census data and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing.

Yours sincerely,

A handwritten signature in black ink that reads "John Spain Assoc." in a cursive style.

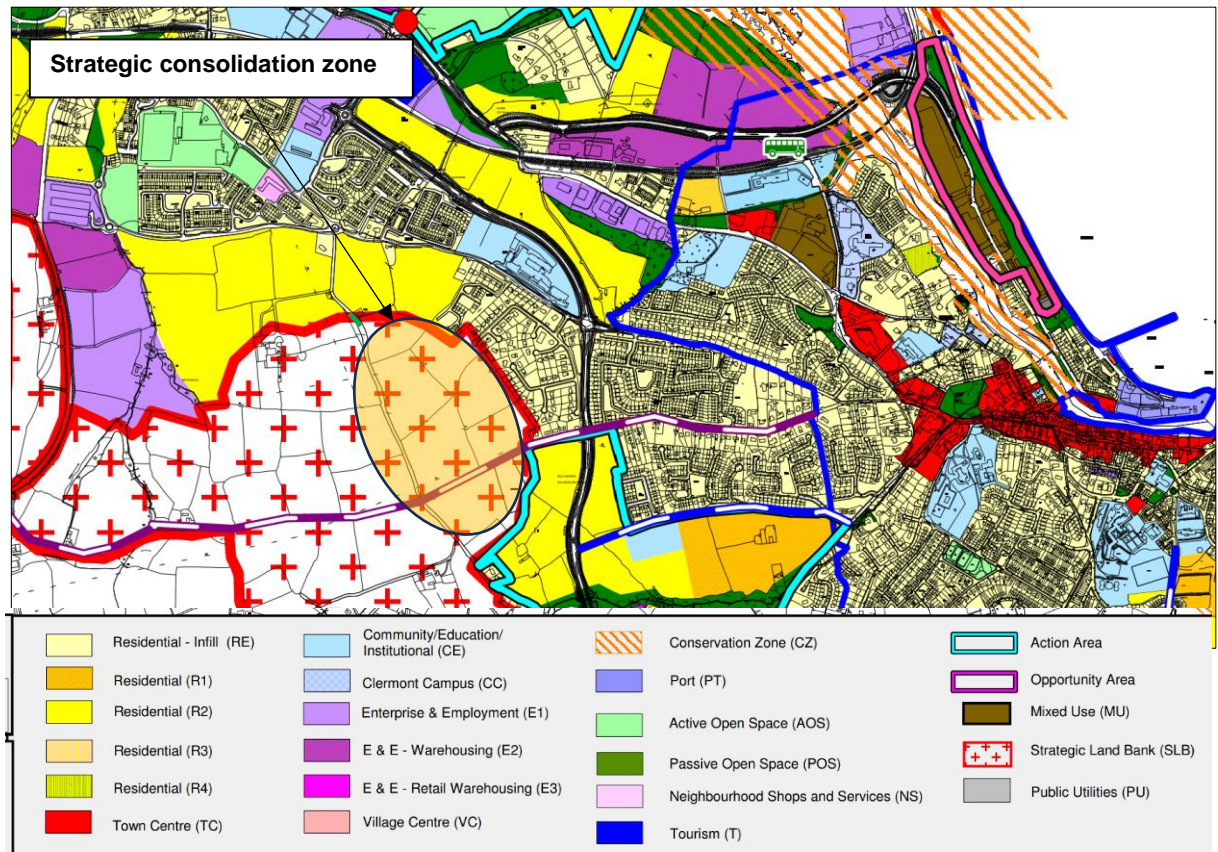
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**John Spain**

*Managing Director John Spain Associates Ltd.*



**Appendix 1 Extract - Zoning Map - Wicklow Town – Rathnew Development Plan 2013-2019**



<https://www.cso.ie/en/csolatestnews/pressreleases/2023pressreleases/presstatementcensus2022/resultsprofile3-householdsfamiliesandchildcarewicklow/>