



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

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CUNNANE STRATTON REYNOLDS

Wicklow County Council
County Buildings
Whitegates
Wicklow Town

30th January 2024

ONLINE PORTAL

Dear Sir / Madam,

RE: SUBMISSION ON PRE-DRAFT CONSULTATION ON GREYSTONES-DELGANY & KILCOOLE LOCAL AREA PLAN

Cunnane Stratton Reynolds Ltd. have been appointed by Beakonshaw Developments Ltd of 25A Shaws Lane, Bath Avenue, Dublin 4, DO4 P5Y6 to prepare a pre-draft submission on the Greystones-Delgany and Kilcoole Local Area Plan for a site located off Sea Road, Kilcoole, Co. Wicklow.

Introduction

Wicklow County Council have commenced the Pre-Draft Public Consultation Process for Greystones-Delgany and Kilcoole Local Area Plan (LAP). The current/previous Greystones-Delgany & Kilcoole Local Area Plan 2013 – 2019 is now outdated.

The County Council therefore intend to produce a new draft LAP covering Kilcoole. This pre-draft opportunity presented for consultation limits submissions to those of a high-level and strategic nature and presents the key topics that the emerging plan will have to address.

The plan making process of the LAP will be over 6 key stages. The process is currently at Stage 1 - Pre-Draft Stage. The Council have invited submissions from the 29th November 2023 to the 31st January 2024.

Purpose of this Submission

The purpose of this submission is to encourage the County Council to zone additional land from the current Strategic Land Bank (SLB) to residential and to encourage unzoned land in the location of Sea Road from agriculture to SLB to maximise projected population growth, revised housing allocations, capitalise on provision of community and social infrastructure and lastly proximity to the rail station – Kilcoole being only one of six towns in the county with a railway station and in anticipation of the anticipated and politically supported rail upgrade. The context for this request is significant population growth experienced across the State in the 2022 census and the need to revise the housing targets for Kilcoole in the emerging LAP from those set out in the current County Development Plan and current LAP for the town.

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Executive Summary

The following are the key points of this submission:

- We understand that at this pre-plan stage submissions will not be received on direct rezoning requests.
- Our client owns land contiguous to existing development to the east of the town, either side of Sea Road, and wishes to see lands brought forward in this location from Strategic Land Bank (SLB) to residential and from agricultural land to SLB to take account of the need for additional housing in the town and given the proximity to the existing rail station and the beach which is an amenity for the whole town and surrounding area.
- The town of Kilcoole is only one of 6 no. towns in the county with a rail station and we believe that this presents an opportunity for additional residential zoning in the town from SLB in particular in close proximity to the station. There will be an upgrade of rail infrastructure in this location further improving the reliability and frequency of service, moving from diesel to electrification powered engines, all of which is entirely more sustainable, and extending the DART service to the county town, to provide a fit for purpose metropolitan rail service to Wicklow Town ensuring that the future development potential of Kilcoole can be achieved over the lifetime of the emerging LAP once it is adopted.
- The current housing targets in the adopted LAP are based on the 2016 census and the population projections available then, as well as the provisions of the previous Wicklow County Development Plan.
- As things stand the pre-consultation paper identifies future housing need according to the population and housing targets for the town set out in the 2022 to 2026 County Development Plan. Those population projections did not take account of the 2022 census results which indicated very substantial growth across the State including Wicklow county. The targets and the Core Strategy in the current County Plan will be subject to review following the review of the National Planning Framework which is ongoing.
- The existing LAP does however identify that Kilcoole has a substantial employment base and has social and community facilities to sustain a population up to 7,000 people (the existing LAP says so). It seems a waste of available employment in the town and adjacent, a waste of any upgrade to the immediately adjacent rail line, a waste of available social and community infrastructure not to seek to sustainably increase the housing allocation for the town when the ESRI's population projections upon which those allocations are made and the population projections produced by the Department from the ESRI are found to be so wide of the mark that both population projections and housing allocations are being rewritten as part of the National Planning Framework Review. There is also an ongoing housing crisis.
- We would emphasise that the population projections produced by the ESRI are not fit for purpose for allocating housing and subsequent zoning land for residential purpose.
- Actual population figures released more recently by the CSO should be used as a more reliable, factually based, and up to date means of estimating housing allocation and residential zoning needs in Kilcoole.
- ESRI projections in 2018 assumed an average household size of 2.8 but this ignores the fact

that household size is reducing by approximately 0.1 every three years since 1966. The average household size is closer to 2.6 persons. This also influences the amount of land requiring to be zoned.

- The same projections by the ESRI assume a period of obsolescence for the existing housing stock on 500 years. This seems unrealistic in the extreme. This also influences the amount of land to be zoned for residential.
- From our planning-based research there would appear to be more scope for additionally zoned land emanating from a 10 year old LAP (adopted in 2013) than here would be from the targets emanating from the more recent CDP – and we certainly know that housing demand is currently exponentially greater now than it was 10 years ago. Current population projections and mandated housing allocations are not a sound basis for assessing future residential zoning needs in the State, in Wicklow county and consequently Kilcoole.
- The take up of residentially zoned land should also be borne on mind and there is clearly substantial take up in Kilcoole.
- Any reference to legacy development in either the existing LAP or in the current CDP and the need to take the current pessimistic or constrained view on housing growth for the town does not take into account the above factors.
- It should also be noted that the housing allocations in the 2022 CDP, with which the emerging LAP must be consistent, does not additionally take account of a need to reallocate housing to all the main settlements proportionally in the county including Kilcoole where it is accepted that an allocation of some 3,000 housing units will have to be re-allocated from Fassaroe due to any enabling upgrade to the M11 not occurring for the foreseeable future and certainly not over the lifetime of the current CDP.
- Our client also requests that a roads objective be contained within the emerging LAP requiring a link road be provided from the existing roundabout on the R774 at Charlesland southwards to the rail station at Kilcoole. This would alleviate congestion in the towns of Greystones, Delgany and Kilcoole whilst improving access to the rail station which is only one of a handful in the county.

Kilcoole and Environs

The town is 3 kms south of Greystones, 14 kms north of Wicklow Town and approximately 28 kms south of Dublin City. The town has a railway station at the beach and is one of only six towns served by a train station in the county of Wicklow. The town is described as a Level 4 town below the larger settlements of the County including Wicklow Town, Bray and Arklow in the county. Kilcoole is just one of the two Level 4 towns with a railway station.

Kilcoole Industrial Estate and Network Enterprise Park are two large employment areas located south-west of the town indicating further justification for additional residential development as a matter of sustainability.

Woodstock Demesne, Druids Glen Golf Course and Druids Health Golf Course are some of the recreational activities close to the town.

Community facilities include the Kilcoole Primary School, St. Anthony's School and Kilcoole Community Centre, St. Anthony's Kilcoole FC, Kilcoole GAA and Colaiste Chraobh Abhann, which are all within the town environs and provide the necessary social infrastructure to support future residential zoning.

It is noted in the Wicklow Tourism webpage that Kilcoole is known as the fictional village of Glenroe as shown in RTE's popular soap opera. Kilcoole is also known for its beautiful coastline and is also considered a paradise for bird watchers. The town has potential for further tourism growth and further employment in this sector.

Our client's lands are strategically situated between the town and the Kilcoole Railway Station and contiguous existing developments to the west. Any proposed development would be an extension of the existing built up area situated close to the railway station, and between the station and the town.

Sea Road is a local road, connecting the town to the railway station. Sea Road can be split into two sections. The first section runs for 750m from the junction of R761 up to Sea Road cul-de-sac. This section has two lanes and footpaths on both sides. The second section is about 800m from the cul-de-sac road to the railway station, and passing in front of our client's lands, this section is a single-lane and has no footpaths. An objective in the 2013-2019 LAP is to provide such a pedestrian footpath. That footpath would be provided to accommodate future development in this location and to the benefit of the town and for the pedestrian safety of station users.

The Kilcoole Estuary lies to the east of the town and along the coast. The N11 lies further west of the town, there are no direct links to the N11 from the town, one needs to get to Knockree Roundabout in Delgany and reach Junction 11 from there. The Junction 11 (N11) is about 4.5 kms from the town and about 8-10 mins drive. Accordingly, our client seeks inclusion of a roads objective set out below.

Access and Connectivity (Local and Strategic)

The station is 1.6 km / 20 mins walk away from the town centre but considerably accessible to the SLB zoned lands to the east of the town. The Pre-draft public consultation document acknowledges excellent public bus transport and to all parts of the County and Dublin.

The M11, which is a national road network is 8 mins / 4 kms drive away from the town centre.

The Dublin Connolly - Rosslare Europort runs on the line. There are in total 14 stops including Dublin and Rosslare. In Wicklow, there are six towns serviced by this service. There are no DART services to Kilcoole currently.

As indicated above there are six towns with railway connectivity. The table below identifies the towns with railway connectivity and their place within the county's defined settlement hierarchy set out in the CDP:

- Level 1 Metropolitan Area and Key Town – Bray
- Level 2 Core Region and Key Town – Wicklow and Rathnew
- Level 3 Core Region and Self-Sustaining Growth Towns - Greystones and Arklow
- Level 4 Core Region and Self-Sustaining Towns – Kilcoole and Rathdrum

There is a long-term vision / plan for a future extension of DART to Wicklow town, serving Kilcoole and consequently serving our client’s lands. There is currently substantial political pressure being brought to bear on that upgrading and extending the DART service to Wicklow town, including Kilcoole. Recent media coverage has indicated that this upgrade would include electrification of the line and the removal of diesel fuelled rail engines and that service would substantially be upgraded in terms of frequency and reliability of service.

Please see the links below regarding rail upgrade:

- <https://www.businesspost.ie/news/dart-services-to-wicklow-town-could-be-in-place-by-2026/#:~:text=It%20is%20intended%20to%20provide,be%20in%20place%20by%202026>
- <https://www.eastcoast.fm/news/wicklow-news/irish-rail-unveil-prototype-for-new-dart-carriages-that-will-serve-wicklow-town/>

Access to the town can be enhanced with the provision of a new pedestrian footpath which would be the subject of the submission by us on the emerging LAP and the provision of which would be a requirement via a planning condition attached to any planning permission. The provision of a footpath in this location benefits the whole town by providing safe pedestrian access to the beach and the railway station which both serve the town.

Existing Greystones-Delgany and Kilcoole Local Area Plan 2013-2019

Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 was adopted in September 2013.

Key Strategic Objectives for Kilcoole [as set out in the Wicklow County Development Plan 2010-2016 (Extract of Table 1.1 of the LAP)] – upon which the 2013 LAP was adopted is as follows, with our response by way of an update also included.

Table 1: Key Strategic Objectives set out in the Wicklow CDP and Table 1.1 of the adopted LAP

<i>Core Settlement, Population & Housing Strategies</i>	<i>Kilcoole is designated a ‘Small Growth Town’ with a target population of <u>4,500 by 2016 and 5,000 by 2022.</u></i>
Our Response	The population of Kilcoole in 2022 set out in that years’ census in 4,569 meaning that the target has not been reached but has very little headroom.
<i>Retail Strategy</i>	<i>Kilcoole is designated a Level 4 ‘Small Town’, serving a local catchment with a range of shopping facilities, including one supermarket / 2 medium sized convenience stores (max 1,000m²) and a relatively large number of smaller shops (10-20 indicated in CDP).</i> <i>Generally not considered suitable for discount foodstores.</i>
Our Response	Noted
<i>Economic Development</i>	<i>Economic function is to be an attractor for investment, targeting local</i>

<p><i>Strategy</i></p>	<p><i>investment, in mainly ‘product intensive’ industries, with some ‘people’ emphasis.</i></p> <p><i>Enhance opportunities for local indigenous enterprise.</i></p> <p><i>Maximise potential associated with N11 transportation corridor</i></p>
<p>Our Response</p>	<p>There is sufficient land of employment in Kilcoole, Delgany and Greystones reflected to its location near the M11.</p>
<p><i>Social Development</i></p>	<p><i>The plan must ensure that sufficient lands are reserved for community uses in line with the future development of the area.</i></p> <p><i>Kilcoole is within Level 3 of the Community Facilities Hierarchy (population range 2,000- 7,000) and as such should provide a relatively narrow spectrum of facilities.</i></p>
<p>Our Response</p>	<p>The community facilities available/planned are sufficient to accommodate a residential population of up to 7,000.</p>
<p><i>Environmental Strategy</i></p>	<p><i>To ensure the objectives of the plan are consistent with the conservation and protection of the environment, the protection of heritage and addressing flood risk.</i></p> <p><i>Integrate Appropriate Assessment, Strategic Environmental Assessment and Flood Risk Assessment requirements in the preparation of the LAP.</i></p>
<p>Our Response</p>	<p>Initial assessments aimed for our client lands indicate that flooding nor the proximity to the Designated Sites, or protected species, would not prevent development even on the Murrough SPA / SAC side of the town.</p>
<p><i>Infrastructure Strategy</i></p>	<p><i>To ensure water services infrastructure is sufficient to cater for the projected population within the plan area. Promote a sustainable land use and transportation policy. Facilitate improvements in local road and transportation infrastructure.</i></p>
<p>Our Response</p>	<p>Infrastructure upgrade of waste water and water supply are currently proposed, The south-east coast rail line is also expected to be upgraded.</p>
<p><i>Landscape Categorisation</i></p>	<p><i>Kilcoole designated a ‘settlement’.</i></p> <p><u><i>Coastal Area of Outstanding Natural Beauty – landscape is of high vulnerability.</i></u></p>

Our Response	The town is in close proximity to the coast. The principle of development on SLB lands to the east of the town has already been accepted by WCC. If the lands are zoned SLB, development is accepted in principle in this landscape character area.
<i>Coastal Zone Management Plan</i>	<i>Cell 5 / Cell 6 Generally, the objectives <u>aim to protect the coastal amenity of this area.</u></i>
Our Response	If the lands are zoned SLB, development is accepted in principle in these coastal cells. Development can proceed without impact on the coastal amenity of this area.

Population and Housing Targets

Kilcoole is designated as a ‘Small Growth Town’ with a projected target population of 4,500 by 2016 and 5,000 by 2022, as per the 2013-2019 LAP. The LAP states:

“In order to support the projected target population of 5,000 persons, the LAP must provide for an increase in the amount of housing units from 1,402 in 2011 to a total of 2,177 units in 2022, representing a total increase of 775 units.”

Table 2: Excerpt of Table 2.4 – Kilcoole – Housing Requirements (Source: 2013-2019 LAP)

Year	Population	Occupancy Rate	Households	Including Vacant Units (5.6%)	Total Additional Units Required
2011	4063	2.97		1402	
2016	4500	2.625	1714	1810	408
2019	4750	2.526	1880	1985	583
2022	5000	2.425	2062	2177	775

The population in Kilcoole appears to be projected at a rate of 250 people every three years (as per the table above). Based on these past trends, there will be a requirement for a further 250 people by 2025, which would only be at the start of the period of the emerging LAP being fully in place. The requirement identified of 775 new homes for 2022 does not then cover the period of the new LAP from 2025-2031 and therefore is misleading even if these figures could be taken at face value in light of the 2022 census population and revised and more accurate population projections and upwardly amended housing allocation likely to come from the current NPF review. The above stops short of a target covering the period of the emerging LAP being in place (ie from 2025 onwards but with accurate projections and realistic housing allocations).

Wastewater

It is stated in the 2013-2019 LAP:

“The wastewater in the Kilcoole and environs agglomeration is served by a secondary waste water treatment plant located off Sea Road, Kilcoole, to the south-east of Kilcoole village. The plant treats all waste waters arising in the north and middle of the village with all other areas in the village being collected in a separate foul sewer system and conveyed to the

Greystones WWTP for treatment as outlined above. This treatment plant is designed to treat a population equivalent of 3,000 p.e. This plant requires upgrading in order to meet the conditions of its licence. Until these upgrades are completed, the capacity of the plant is severely restricted.”

As per the LAP, Greystones Waste Water Treatment Plant (WWTP) at Woodlands, Greystones has the capacity to treat 40,000 p.e. (population equivalent).

It is also stated that:

“Wicklow County Council has developed a proposal for the construction of a new 22,000 p.e WWTP at Leamore, Co. Wicklow (which is south of Kilcoole) and associated sewer network and connections. It is expected that this plant will eventually treat all waste waters arising in the villages of Newcastle, Newtownmtkennedy, Kilpedder and Kilcoole.”

On the basis of the above there would appear to be therefore sufficient waste water capacity to facilitate further residential development in Kilcoole as identified in the 2023 LAP subject to such infrastructural investment.

Water Supply

Greystones-Delgany and Kilcoole are served by water treated at the Vartry Waterworks at Roundwood (owned and managed by Dublin City Council). Whilst most of Greystones is served by the Drummin Reservoir, the Charlesland area is served from a combination of the Drummin and Priestsnewtown Reservoir, which also serves Kilcoole.

The 2013-2019 LAP states: *“It is considered that there is an adequate supply of water to provide for the needs of the targeted population of the area up to 2022.”*

We are not aware of any current constraints to water supply in Kilcoole that would in any way prevent the zoning of much needed additional residential lands.

Zonings

Our client’s lands are in two parcels. These parcels are located directly off Sea Road, one parcel to the north and the other to the south of the road. Part of the southern parcel is zoned as SLB and is within the existing LAP boundary. The rest of the southern parcel and the entirety of northern parcel are unzoned or zoned as agricultural lands and lies outside the current LAP boundary.

The objective for SLB zoning is *“To provide a strategic land bank for future phases of development of the settlement after the lifetime of this plan.”*

It is also noted that SLB lands *“are identified as potentially being part of the envelope of the settlement with regard to proximity and accessibility to infrastructure. However detailed consideration of these areas and appropriateness for zoning will only be considered after the lifetime of this plan. For the sake of clarity, SLB lands form part of the rural area. Planning applications shall be assessed on the basis of the objectives and standards for the rural area, as set out in the Wicklow County Development Plan.”* It is reasonable to assume that SLB lands will come forward based on housing need, actual population growth, revised housing targets and given proximity and accessibility to infrastructure, as indicated directly above, which in this case should mean rail where such access and proximity is relatively limited in the county.

This means the majority of our client's southern parcel of lands zoned SLB can now be actively considered for immediate zoning essentially in light of the review of the NPF, renewed population projections and housing allocations, and in the midst of a worsening housing crisis.

The SLB lands in this location to the east of the town, would be identified already for future development because of their proximity to the rail station and contiguous nature to existing developments, as well as access to a major amenity in the area (ie the beach).

The northern portion of our client's lands are unzoned and we request that they be considered for SLB or preferably given consideration to residential given the proximity to the station.

There is an objective to improve the Sea Road – RO14 as identified on the zoning map, it is stated "*Improvement of Sea Road, Kilcoole, including the development of a footpath from Main Street to Kilcoole Train Station.*"

There are 4 no. SLBs identified on the zoning map. It should be noted, that our client's land (southern parcel) is the largest 'SLB' identified in the existing LAP, and is also unique amongst SLB lands providing an economy of scale and delivery of much needed housing should it be zoned residential closest to the railway station.

Residential Zoned Lands in Kilcoole

There are only two types of residential land zoning in Kilcoole, other than 'Existing Residential' and 'Strategic Land Bank', these are:

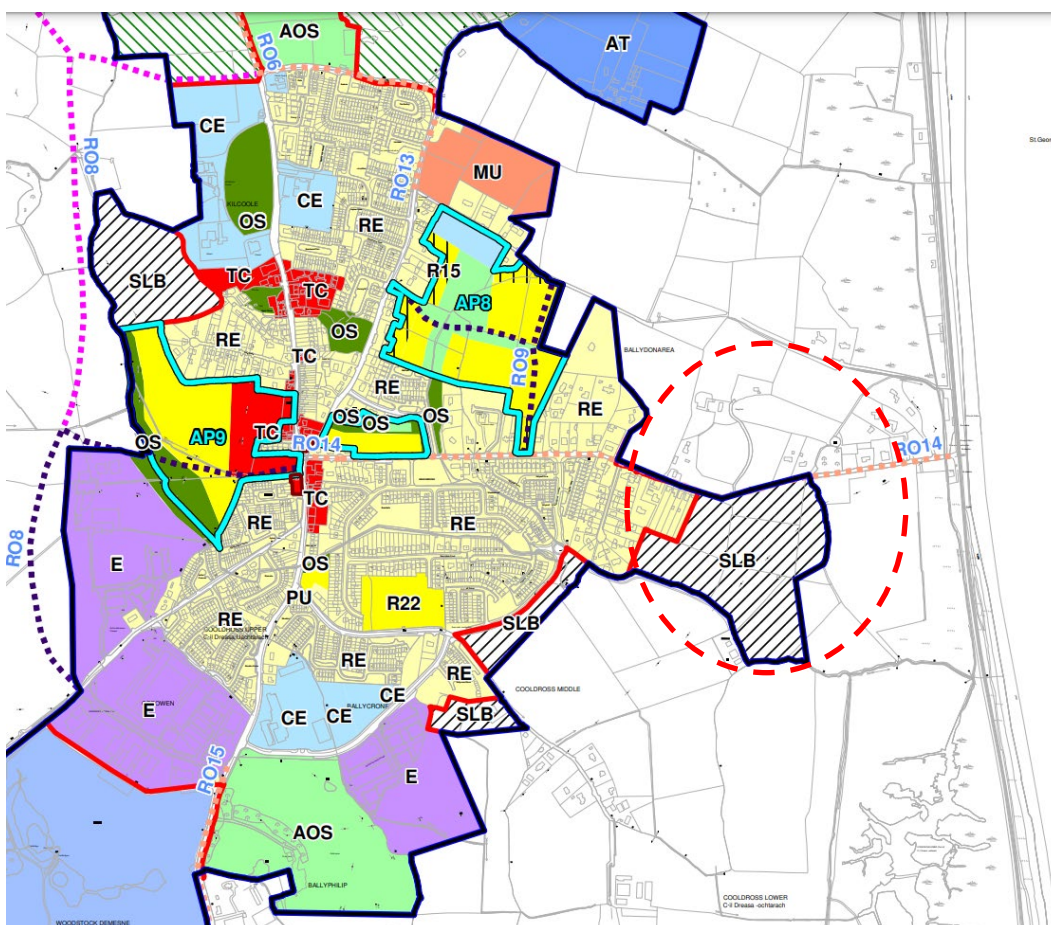
- R22: Residential - *To provide for the development of sustainable residential communities up to a maximum density of 22 units per hectare and to preserve and protect residential amenity.*
- R15: Residential - *To provide for the development of sustainable residential communities up to a maximum density of 15 units per hectare and to preserve and protect residential amenity.*

The existing residential zoning and SLB objectives are as follows:

- RE: Existing Residential - *To protect, provide for and improve residential amenities of adjoining properties and areas while allowing for infill residential development that reflects the established character of the area in which it is located.*
- SLB: Strategic Land Bank - *To provide a strategic land bank for future phases of development of the settlement after the lifetime of this plan.*

The majority of residential zoned lands identified in the existing LAP and within the town development boundary are identified to be R22, i.e., lands that can support a max. density of 22 units per hectare (uph). A minority of lands are zoned as R15 i.e., lands are that can support a max. density of 15 uph as identified on the zoning map below reproduced as Figure 1 below.

Figure 1: Land Use Zoning Map in adopted LAP (our client's lands in dotted red line)



RE: Existing Residential		E: Employment		Action Plan	
R22: Residential - 22/ha		E1: Employment		Opportunity Site	
R17: Residential - 17/ha		E2: Employment		Road Objective - Long term	
R15: Residential - 15/ha		CE: Community and Education		Road Objective - Short Term	
R10: Residential - 10/ha		OS: Open Space		Road Objective - Road Improvement	
R5: Residential - 5/ha		AOS: Active Open Space		Indicative Green Routes	
R2.5: Residential - 2.5/ha		GB: Greenbelt		Core Retail Area	
SpecialR: Special Residential		AT: Agri-Tourism		Community Building	
TC: Town Centre		T: Tourism		Settlement Boundary	
VC: Village Centre		MU: Mixed Use		LAP Boundary	
NC: Neighbourhood Centre		PU: Public Utility		Indicative Through Access Route	
SLC: Small Local Centre		SLB: Strategic Land Bank			

Flooding

Our client has undertaken flooding assessment in this area, to the east of the town, and has identified that it will not prevent development but in circumstances where open space and land is kept free from development, will bring significant ecological advantage for the various species prevalent in this area and those qualifying species for the adjacent Designated Sites.

Relevant Objective:

“CPO 17.26 - Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority

having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance."

Emerging Greystones-Delgany & Kilcoole Local Area Plan 2024-2030

At this Pre-Draft Stage, WCC are seeking broad based submissions under these following topics:

- Housing – Population - Compact Growth
- Regeneration of Communities & Places - Healthy Placemaking - Urban Design
- Economic Opportunity – Tourism - Shops & Services - Community Facilities
- Heritage - Biodiversity - Green Infrastructure - Climate Action – Energy
- Infrastructure - Sustainable Movement – Transportation
- Any Other Issue - Environmental Assessment - Implementation/Delivery

What is Wicklow County Council's Big Picture 'Strategy' for the development of Kilcoole?

The following four points are identified as the 'Big Picture Strategy' for Kilcoole:

- *Kilcoole is designated as a Level 4, 'Self-Sustaining Town', i.e. towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.*
- *Kilcoole is located on the rail line and has good quality bus links.*
- *There is a population allocation of c. 4,778 persons for 2028 (from a population of c. 4,244 persons in 2016).*
- *There is a housing growth target of c. 170 from 2022 to 2031. [It is estimated that growth in Kilcoole will exceed this target range before the end of the plan period due to legacy housing developments under construction.]*

Our response to each of these factors, most of which are now overtaken by recently confirmed actual 2022 population growth and political pressure to upgrade the rail line is set out below;

- *Kilcoole is designated as a Level 4, 'Self-Sustaining Town', i.e. towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.*

Our Response – As a self sustaining town, Kilcoole has more than ample social/community facilities for a population of up to 7,000 people as recognised already in the existing LAP by WCC and has sufficient employment within Kilcoole, in Delgany, and in Greystones as identified in the existing LAP. A Level 4 town should have a proportionately high level of future housing allocation (in respect of the actual 2022 population growth and the reallocation of 3,000 units from Fassaroe, where development cannot proceed as originally envisaged).

- *Kilcoole is located on the rail line and has good quality bus links.*

Our Response – Kilcoole is one of only six towns in County Wicklow to be served by a railway station. Although the railway line is a high-frequency and high-capacity line, there are limited train services to Kilcoole. During weekdays, there are 4 trains northbound (three during the day and one at late night) and there are 4 trains southbound (mostly in the evenings). During Saturdays, there are 4 trains northbound (three during the day and one in the night) and there are 3 trains southbound. During Sundays, there are 3 trains each in each direction.

Dublin Bus provides a service between Kilcoole and Dublin on its 84X bus route, with a journey time of about 80 minutes. The service on the number 84 bus route terminates at Blackrock.

- *There is a population allocation of c. 4,778 persons for 2028 (from a population of c. 4,244 persons in 2016).*

Our Response – Why are WCC using antiquated population data from the 2016 census rather than the 2022 census which clearly shows significant population growth in the county over the period 2016 to 2022? The population allocation of 4,778 persons for 2028 is just 200 persons over the lifetime of the new LAP, and just over half of that lifetime (ie just 4 years into a 6 year plan and clearly the emerging LAP housing target cannot cover just two thirds of the 6 year statutory period). The target for 2028 is within reach from the 2022 census (population of 4,569) and we note the following to further undermine this target just two thirds into the 6 year LAP plan period - revision of population projections; housing allocations be revisited; the re-allocation of Fassaroe housing allocation; a time of worsening housing crisis; and significant population increase in this town already experienced.

- *There is a housing growth target of c. 170 from 2022 to 2031.*

Our response – A growth of c. 170 units or 20 units per annum is just unsustainable and is most definitely not reflective of (i) actual population growth, nor (ii) of the ongoing housing crisis, nor (iii) of a revised NPF.

The suggested 850 new homes is based on flawed ESRI projections that have not been updated and do not reflect actual demand set out in the 2022 Census results. It should be noted that the housing allocations for all the County Wicklow settlements, including Level 4 will need to be re-evaluated pending the completion of the review of the NPF. The Core Strategy for WCC will also eventually need to be revised. It is not clear whether that re-allocation of 3,000 units spread from Fassaroe is included to this target. There is no indication or evidence that this reallocation is being considered at least in part for Kilcoole as one of the higher order settlements in the county.

Regarding 'Housing', the Council are seeking submissions on:

Greystones-Delgany and Kilcoole will need approximately 850 new homes built between now and 2031 [It is estimated that growth in these settlements will exceed this target range before the end of the plan period due to legacy housing developments under construction]. To facilitate compact growth, 30% of new homes need to be in the existing built up area and town centre. Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet this housing target. These homes

must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment.

Some of the sample questions posed are:

> Where should higher densities be located? How do we deliver higher densities?

- It is clear and consistent with national planning guidance that increased densities should be provided within the town centres or in close proximity to public transport corridors.

> Where do we deliver our new housing without contributing to urban sprawl?

- Some urban expansion is inevitable and national planning guidance recognises this.

> What sites in the town centres or other areas could be redeveloped to maximise opportunities?

- This is a matter for the observers / land owners.

> Where are the vacant or underutilised sites in the settlement? How can the plan maximise the use of these sites?

- A review of the existing 2023 zoning map would indicate that there is limited opportunity for infill development in the town.

Wicklow County Development Plan 2022-2028

On 12 September 2022 the Elected Members of Wicklow County Council resolved to 'make' the Wicklow County Development Plan 2022 - 2028. This Plan came into effect on the 23rd October 2022.

The adopted Wicklow County Development Plan 2022-2028 is the subject of a legal challenge by two of the largest housebuilders in the State, Cairn Homes and Glenveagh Properties. They have legally challenged the adopted County Plan on the basis that it, like other plans throughout the State, is based on out-of date population data and projections provided by the ESRI. They are effectively arguing with some justification, in this author's view, that the population projections issued by the ESRI upon which the Department advised local authorities on the quantum of lands to be zoned for residential is based, are out of date and do not form a 'sound basis' for assessing housing need and consequently the amount of land to be zoned for residential development across the State including County Wicklow. Please see <https://www.irishtimes.com/business/2022/10/27/builders-challenge-wicklow-development-plan/>. This article in the Irish Times dated 27th October 2022 also states that '*Wicklow's 2022-2028 development plan complies with the National Planning Framework, whose projections are based on the 2016 census rather than the one that the Central Statistics Office completed earlier this year*'. The Government has subsequently began a review of the NPF. The Minister of Housing Darragh O'Brien indicated previously that this 'could lead to councils zoning more land for new home building.'

Population Targets

Population targets for the county are set out in the current CDP and excerpted in Table 3 below but are based on the 2016 census and not the 2022 census. The census identified significant population growth in the county to 2022.

Table 3: Population Projections

Year	2016 (actual)	2026 (projected)	2031 (projected)
Wicklow	142,500	155,700 – 157,500	160,500 – 164,000

The population of the County was actually 155,851 as enumerated in the 2022 Census – which is only 4,000 people across the county short of the lower end of the target nearly ten years on from 2022 and the census results from that date. The 2026 target for the county was reached in 2022 therefore.

Housing Targets and Completions

The housing targets for the county, and consequently Kilcoole, are based on the Housing Supply Target Guidelines for Planning Authorities issued by the Department of Environment in December 2020. Those nationwide housing targets are flawed because the population projections by the ESRI, upon which they are based, are also flawed. These are expected to be revised as part of the NPF review.

The population targets taken from the 2022 CDP but not taking into account the actual census results from earlier that year are shown below in Table 4 below. The housing targets for all settlements in the county must be reviewed but certainly the opportunity to review the targets from Kilcoole must be taken.

Table 4: Housing Targets contained in the adopted CDP

County	Units delivered 2017-2020	Estimated completions Q1 2021 - Q2 2022	Target 2022 - Q3 2028	Target Q3 2028 - Q4 2031	Total
Wicklow					
New housing demand	3,230	1,404	8,467	1,848	14,949

Kilcoole is identified as ‘Level 4 – Core Region – Self-sustaining Town’ in the Wicklow Settlement Hierarchy, as listed under Table 3.3 of the CDP. An extract of Table 3.3 in the adopted CDP is presented below:

Table 5: Extract of Table 3.3 of the CDP

Level	4
Settlement Typology	Core Region Self-Sustaining Towns
Description	Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining. <i>"Self-Sustaining Towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. There is a strong emphasis on aligning population growth with employment growth to make these towns more self-sustaining and capable of accommodating additional growth in the future."</i>

We would dispute the fact that Kilcoole has a weak employment base and the range of employment opportunities in the town is already relatively well developed as accepted in the existing LAP and is capable of supporting further residential development especially given past population growth in the town and existing and enhanced rail transport.

Housing targets set out in Table 3.2 under Section 3.4 of the CDP;

"In a small number of cases, the targeted housing growth rate has had to take account of significant legacy housing developments already in train, which would result in a higher growth rate than may have been appropriate for the settlement given its position in the hierarchy and asset capacity."

Acceptance that growth of Kilcoole will exceed targeted growth rates due to legacy housing developments is acknowledged in Table 6 below but this completely ignores the fact that the current CDP is based on flawed population growth projections and is based on flawed housing allocations issued to all County Councils in the State.

Table 6: Justification of settlement hierarchy (extract of the CDP)

Level	Justification
4	Towns in Level 4 are generally targeted for growth rates around 20%-25%. Newtownmountkennedy (at c.65%) and Rathdrum (at c.45%) will significantly exceed this target due to legacy housing developments under construction. The goal for these towns is to limit further development, other than for town centre / infill / regeneration. It is estimated that growth in Kilcoole will exceed this target range before the end of the plan period due to legacy housing developments under construction

The comments about exceeding the target range outlined in bold above should be considered against potentially revised housing targets for the main settlements within County Wicklow as set

out below and the review of the NPF.

The population target for Kilcoole is 4,778 by Q2 2028. The actual population is 4,569 as per 2022 Census. A difference of 209 persons is reached 6 years in advance. Those projections may be increased post NPF review.

The following is an extract of the CDP regarding population targets for Kilcoole;

Table 7: Population Projection as set out in the CDP

Settlement	Population 2016	Population Target Q2 2028
Kilcoole	4,244	4,778

The above Table 7 indicates a population increase of 534 people over a period of two statutory development plans (i.e., 12 years) at a time when housing is in worsening crisis mode and where housing shortage is preventing economic growth.

The Housing Target for the period 2016-2031 was 287 units, out of which 97 units were completed during 2017-2020 period. Therefore, another 190 units are to be provided by 2031, as per the CDP, from 2020.

Our Table 8 below is an extract of Table 3.6 – Housing development completed, underway and permitted in Co. Wicklow (data as of 31st March 2021) contained within the CDP.

Table 8: Extract of Table 3.6 – Housing development completed, underway and permitted in Co. Wicklow (data as of 31st March 2021)

Level	Settlement	Housing Units completed post 2016	Units under construction	Extant permission
4	Kilcoole	97	23	17

The above figures, despite reference to legacy development does not indicate a town being swallowed up with new development or its character being irrevocably changed for the worse from development proceeding at a significant, but not unsustainable, pace.

National Planning Guidance

National Planning Framework

The National Planning Framework (NPF), titled 'Ireland 2040 Our Plan', was adopted in conjunction with the NDP in 2018 and identifies Strategic Outcomes that matches Investment Priorities of the NDP with best planning practice. It's population projections are already found to be flawed with significant consequences for the provision of homes. Hence it is currently being reviewed.

It is stated that, 'Key future planning and development and place-making policy priorities for the Eastern and Midland Region' include:

“Enabling the complementary development of large and county towns in the wider Greater Dublin Area and Midland areas on the key strategic and public transport routes in a regionally co-ordinated manner, with an enhanced emphasis on measures to promote self-sustaining economic and employment based development opportunities to match and catch-up on rapid phases of housing delivery in recent years.” (pg. 35)

Kilcoole has a strong employment base on a significant public transport route and will experience another 137 units completed / under construction / extant permissions set out in our Table 7 above. This is clearly not significant in a town of currently

It is stated that ‘Ireland’s future homes’ will:

“be located in places that can support sustainable development - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change” (pg. 92)

Kilcoole is a well established place of work with excellent public transport already acknowledge by WCC. It is stated that under the NPF the Government will support:

“More energy efficient development through the location of housing and employment along public transport corridors, where people can choose to use less energy intensive public transport, rather than being dependent on the car” (pg.120)

The subject lands are in close proximity to the rail station.

Relevant Objectives:

“National Policy Objective 33 - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 64 - Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.”

Review of the NPF

The Minister for Housing, Local Government and Heritage, Darragh O’Brien, on 19th December 2023 announced the commencement of the process to revise the National Planning Framework (NPF) and published the Roadmap for this First Revision. The reason for that is clear – the NPF is not delivering the quantum of houses needed to house the State’s population and is not providing these at an appropriate rate and in the right locations.

“The Road Map:

- *gives an outline of the process and the intention of the revision to the National Planning Framework*
- *has been prepared to inform all interested parties of the revision*
- *outlines the background to the process and the timeframes for each stage of the revision*

- *confirms the consultation processes involved in the revision*

In acknowledgment of the changing profile of Ireland’s population structure, the department has engaged the Economic and Social Research Institute (ESRI) to update their previous independent and peer-reviewed research on Structural Housing Demand research which was published in December 2020 and forms the basis for the calculation of housing supply targets at local authority level. The work of the ESRI is dependent on the release of Census 2022 data by the CSO. The data provides the evidence base to inform any revision to the National Planning Framework and subsequently any update to housing supply targets as set out in Housing for All.”

The Census 2022 data was recently released by CSO. The NPF will be updated and the population targets and housing supply targets will be updated at local authority level. It is very likely that population projections will be revised upwards accordingly to reflect greater than anticipated 2022 population. The growth in Kilcoole exceeds the State’s level of growth from 2016-2022.

National Development Plan 2021-2030

The National Development Plan 2021-2023 is prepared by the Department of Public Expenditure and Reform.

Major investments in this NDP of relevance includes the following:

NSO 1 – Compact Growth • Deliver an average of 6,000 affordable homes each year • Urban Regeneration and Development Fund • Croí Cónaithe Fund

NSO3 - Strengthened Rural Economies and Communities • Rural Regeneration and Development Fund • National Broadband Plan • Supports for the remote working hub network • Better public transport through the Connecting Ireland bus programme

NSO 4 - Sustainable Mobility • BusConnects for Ireland’s Cities • Commuter Rail – Regional Cities, MetroLink and Dart+ • Greener and Cleaner Bus Fleets

It is stated under Chapter 6: Compact Growth (NSO 1) that *“A transport-led housing development approach will allow for the emergence of sustainable and well-connected communities where active travel is feasible and attractive for many localised journeys and good quality public transport is available to facilitate longer journeys into the major urban centres.”*

A transport led approach in this case would be to bring forward much needed residential zoned land from the SLB reserve especially at a time when it is needed most and make it available near the train station.

It is stated under Chapter 8: Strengthened Rural Economies and Communities (NSO 3) that *“This NDP will also support the expansion of sustainable mobility options, both in the context of improved public transport and expanded active travel infrastructure, with the aim of offering citizens in rural areas a sustainable alternative to the private car.”*

It is stated in Chapter 9: Sustainable Mobility (NSO 4) that *“aligning strategic land use planning with transport-led development can support the delivery of large-scale housing development at key strategic locations”*. This indicated that zoning should be informed by proximity and availability of public transport.

Investing on Dart+ is one of the strategic investment priorities identified in the NDP. Regarding DART+ it is stated that *“The programme comprises a number of infrastructural projects – DART+ West, DART+ South West, DART+ Coastal North to Drogheda via Balbriggan, and DART+ Coastal South – and also a significant expansion of fleet, both battery-electric (BEMUs) and electric multiple units (EMUs).”*

Regional Spatial and Economic Strategy - Eastern and Midland Regional Assembly

The subject site is located within the area covered by the Eastern and Midland Regional Assembly (EMRA) - Regional Spatial and Economic Strategy (RSES) 2019.

Guiding Principles - Integration of Land Use and Transport:

- *The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life. Accessibility by car does need to be provided for, but in a manner, which complements the alternative available modes. Local traffic management and the location / management of destination car parking should be carefully provided.*
- *Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.*

The subject lands can provide enhanced and safe pedestrian access to the beach and the rail station.

Greater Dublin Area Transport Strategy 2022-2042

The Transport Strategy for the Greater Dublin Area (GDA), 2022-2042 has been prepared and published by the National Transport Authority. In January 2023, the GDA Cycle Network Plan, consisting of the Urban Network, Inter-Urban Network and Green Route Network for each of the seven Local Authority areas was adopted as part of the GDA Transport Strategy 2022-2042.

Section 12.4.9 ‘Further Extension of Dart’ of the Transport Strategy states *“On the South-East Line, the extension of electrified services to Wicklow town would provide a significant enhancement of rail service to this county town, which will alleviate some of the road congestion pressures along this overall transport corridor”*. A relevant measure in this instance includes the following:

Measure RAIL3 – *DART Extension The NTA and Irish Rail will, over the lifetime of the Strategy, extend the DART to deliver electrified rail services to the following towns: • Sallins / Naas; • Kilcock; and • Wicklow*

The below map is an extract of the GDA Cycle Network Plan. In the map, Sea Road is identified to be a Secondary link and a ‘Greenway – Leisure’ link is shown along the coast.

Figure 2: Excerpt of GDA Cycle Network



From the above, it is clear that there is a presumption in favour of zoning lands for development close to public transport in circumstances where additional housing is needed. The site is also accessible to an enhanced cycle network with potential for enhanced pedestrian footpath linking the town and the rail station thereby moving away from dependence on cars in accordance with national planning and transport guidance.

Development Plans - Guidelines for Planning Authorities

Development Plans Guidelines for Planning Authorities were prepared by the Department of Housing, Local Government and Heritage, and published in June 2022.

The new national guidelines are intended as the ‘go-to’ reference manual for the preparation of local authority development plans and aims to ensure Development Plans take into account the forecasted amount of housing in an area and that sufficient new homes can be built in key areas of housing demand.

Section 1.3 sets out a renewed focus on more sustainable growth through compact urban settlements, supported by accessibility to transport, jobs, services and amenities which is considered key to recuring greenhouse emissions, inefficient lands and natural resource consumptions and environmental degradation. It is recognised that the ‘translation of this compact growth agenda into the development plan is a key task for development plan preparation.

Section 1.6 (Planning from an Evidence Base and Monitoring the Outcomes) stipulates that the process of preparing a plan must be informed by local experience of planning over time. This means that the current plan-making exercise needs to be realistically informed by the delivery and outcome of previous plans and planning objectives for the area and we emphasise that support for plans and zoning must be based on up to date evidence and in this case 2022 Census and more up to date accurate population projections and housing allocations than the County Council has used up to this point. There is no recognition in the pre-consultation material about housing need, population growth and the need for new housing allocations.

Section 4.4.2 (Lands / Sites Proposed to be Zoned) states that “*Estimating requirements for land and sites to be zoned for residential or a mixture of residential and other uses must follow on from an assessment of whether the amount of land already zoned is adequate to meet the housing*

needs of the area. The rate of take-up and build-out of such land over a preceding period of at least 6-10 years is an important consideration in this regard.”

The guidelines add further that:

“Such analysis must also consider trends and projections in respect of rural housing output and infill development/building refurbishment, as well as whether land already zoned may be serviced or serviceable within the six-year life of the plan.”

It is further noted that it is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced development plan, However, it is recognised that there is a need for some degree of competition and choice in the residential land market.

Crucially in the context of Kilcoole it is stated that:

“.....in considering whether to zone additional new land and sites for residential (or a mixture of residential and other uses) to meet housing need, planning authorities must ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the development plan, while also considering and factoring in the proportion of projected housing need to be met on unzoned land in rural areas.”

As indicated above the Core Strategy will have to be re-informed by the NPF review.

In regard to the future zoning of land from targets set out in Section 4.4.3 (Ensuring Sufficient Provision of Housing Lands/Sites) of the Guidelines, it is stated that:

“In making provision for housing within settlements in the core strategy of a development plan, in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. This means that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded.”

Given that Kilcoole is served by high quality public transport including public bus and s one of the relatively few towns in the county to have a railway station, we believe that Kilcoole has merit in receiving additional provision without affecting other towns in the County settlement hierarchy. Without damaging the county’s settlement hierarchy especially if the Fassroe 3,000 units have to be allocated throughout the county.

When considering the zoning plight for Kilcoole we would refer the local planning authority to the following as outlined in the Guidelines:

(a) There is no automatic presumption of Additional Provision land or sites to meet housing supply targets in any development plan. The extent of any Additional Provision must be identified, quantified and explained in the core strategy and should not exceed 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole, for any six-year plan period;

(b) Housing supply and population targets for the relevant six-year development plan period, and the location and level of servicing of lands already zoned for development, in

accordance with 4.4.1 and 4.4.2 above;

(c) The need to target a minimum of 30% of all new residential development in settlements outside cities and 50% in cities and their suburbs, as brownfield or infill development within the boundary/built footprint of the existing built-up area;

(d) Any parts of strategic and sustainable development sites that will be phased and built out over a longer period than the six-year development plan (such as large-scale urban regeneration areas, transport-led development sites or SDZs), which may be included over and above as Additional Provision lands (per section 4.4.4 below);

(e) Additional Provision must comprise land and sites that are serviced or serviceable within the six-year plan period;

(f) The location of zoned lands and sites within the settlement must have regard to the position of the settlement in the settlement hierarchy, access to employment and public transport, be consistent with sequential development patterns, Town Centre First principles, proximity to services and facilities and the need to reduce carbon emissions;

(g) Additional Provision of serviced lands where concentrated in a particular area or settlement, may be phased in a clear sequence of priority to facilitate development management decisions and development monitoring by the planning authority and An Bord Pleanála;

(h) Additional Provision must be compatible with the core strategy regarding the proportion of projected housing demand to be met on unzoned land in rural areas.

We request that future consideration of land use zoning be conducted in accordance with the sequential approach outlined in Section 6.2.3 (Sequential Approach to Zoning for Residential Development) with regard to up to date population projections and housing allocations – not those figures presented in your pre-draft material dating back to 2016. This sequential approach should reflect the compact growth utilisation of existing infrastructure and town regeneration national policy objectives of the NSF, furthering development the Tiered Approach. It is acknowledged that the spatial pattern of the growth of settlements, often along radial access, characterised by ribbon and low density development, had served to promote extremely high levels of car dependence and to spread out development, making them inaccessible.

The Guidelines seeks to assist in changing this historical unsustainable spatial growth pattern towards a more compact growth approach and transport-led growth planning.

The Core Strategy for WCC will have to reviewed to demonstrate consistency with national and regional spatial strategy and policy.

The review of the NPF will utilise revised population and housing targets for the State and will be based on the CSO 2022 Data. It is expected that the revised NPF will utilise higher, projected population and housing for the State, based on the evidence that record growth was experienced in the period from 2016-2022. This means that County Plans and their population and housing targets, including the Wicklow CDP, will be reviewed in due course upon revision of the NPF.

Assuming that the population and housing targets being increased across the State, this will likely lead to more lands being zoned for residential purposes to accommodate an increasing population and provide sufficient housing.

Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities

Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities was prepared by the Department of Housing, Local Government and Heritage, and was published on 15th January 2024. The Guidelines replace the Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities issued as Ministerial Guidelines under Section 28 of the Act in 2009 (now revoked).

Chapter 3 - Settlement, Place and Density of the Guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density.

As per the Sustainable Residential Development Guidelines, a town such as Kilcoole with a population of less than 5,000 people falls within a 'Small and Medium Sized Town'.

The strategy for all small to medium sized towns is to support consolidation within and close to the existing built-up footprint.

The key priorities for compact growth in smaller to medium sized towns in order of priority are to:

- a) strengthen town centres,*
- b) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
- c) realise opportunities for adaption, reuse and intensification of existing buildings and for backland, brownfield and infill development, and*
- d) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement."*

None of these key priorities for compact growth would be compromised as our client's lands are contiguous to existing development, and where that occurs elsewhere in the town on SLB lands, those other lands do not have the same high degree of access to rail transport that our client's lands have.

The Need for Up-to-Date Population Projections and Housing Targets

The population increased in the State by 387,274, about 8.1% growth in the period 2016-2022. The population increased in Wicklow County by 5,785, about 9.4% growth in the period 2016-2022. The population increased in Kilcoole by 325 persons, about 7.6% in the period 2016-2022. This is set out in Table 9 below.

Table 9: *Population Growth in the State, County Wicklow and Kilcoole including 2022 Census*

Year	Population of Ireland	Population Growth in Ireland	Population of Wicklow	Population Growth in Wicklow	Population of Kilcoole	Population Growth in Kilcoole
2011	4,581,269	-	136,640	-	4,049	-
2016	4,761,865	4%	142,425	4.2%	4,244	4.8%
2022	5,149,139	8.1%	155,851	9.4%	4,569	7.66%

Population projections as per the ESRI Regional Demographics and Structural Housing Demand at a County Level (Dec 2020) are set out in Table 10 below upon which housing allocations in the county were based. Comparison of the two tables indicates an underestimate of the population in the county in both 2016 and 2021/2022.

Table 10: *Extract of Table B.2 Population Projections by County 2016-2040 (ESRI 2018)*

Population ('000), baseline			
	2016	2021	2026
State	4,739.6	5,031.8	5,238.6
Wicklow	141.8	150.5	157.4

This ESRI study was published in December 2020. By 2026, the population of the State was estimated to reach 5 million in 2021 and 5.2 million by 2026. The population of County Wicklow was estimated to reach 150,500 by 2021 and 157,400 million by 2026.

As per the Census 2022, the State reached 5.15 million and Wicklow County reached 155,851 people in that year. Comparing the actual populations to the projected populations, the State and the County reached unexpected growth and substantially surpassed the 2021 projected population target.

Population Projections as per the Wicklow CDP

Below is the population projection for Wicklow County as detailed in the CDP 2022-2028. The population was projected to reach 155,700 – 157,500 by 2026. As per the 2022 census, the actual population of Wicklow County was 155,851 by 2022. The population which was expected to be reached in 2026 had already been surpassed in 2022 by comparing Table 11 below with Table 8 (2022 census results).

Table 11: Population Projections as per 2022 CDP

Year	2016 (actual) (CSO)	2026 (projected – CDP)	2031 (projected – CDP)
Wicklow	142,500	155,700 – 157,500	160,500 – 164,000

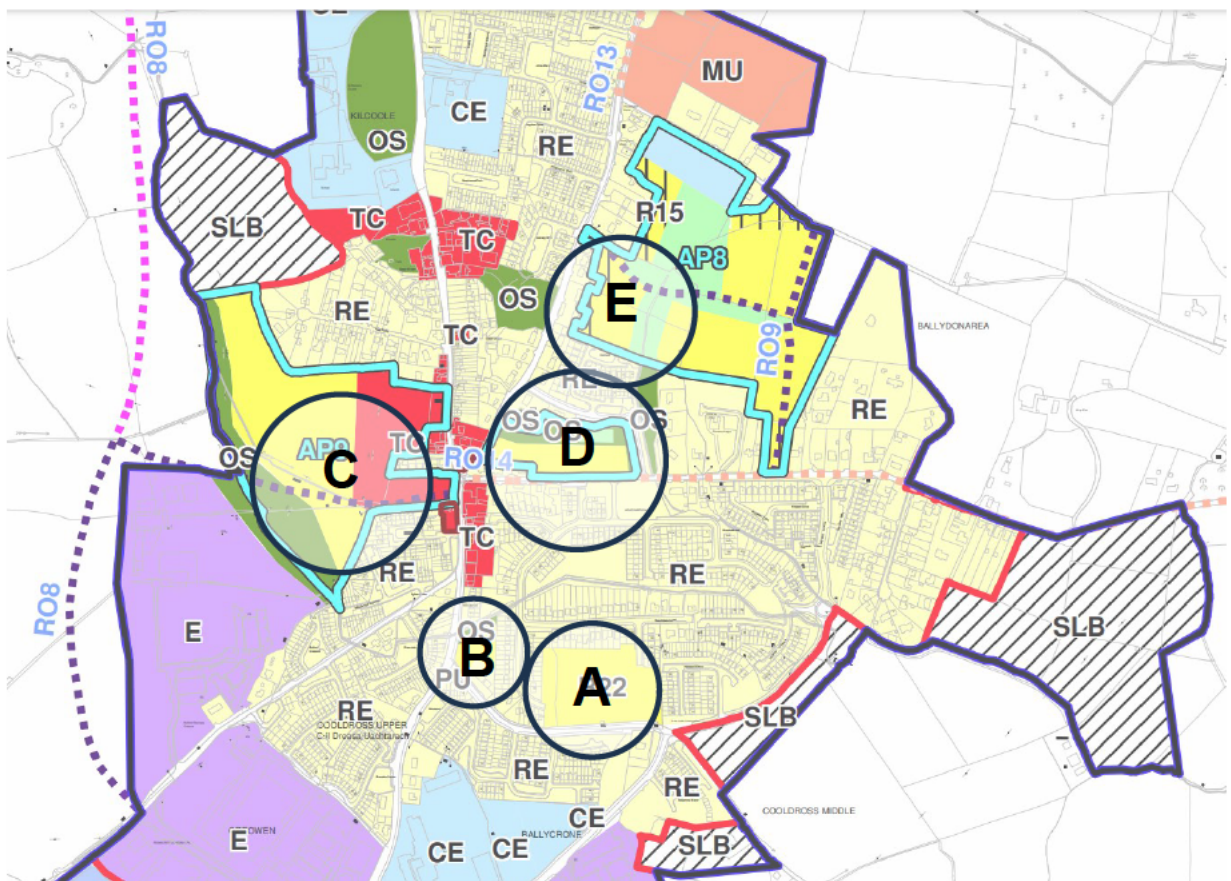
It can be said that there was higher population growth than expected / projected in the ESRI report and in the Wicklow CDP (which was based on the ESRI Study) for both the State and the Wicklow County.

Take up of Residentially Zoned Sites in the 2013 LAP

We have identified the residentially zoned sites in the town and identified their planning status to identify whether additional land needs to come forward for zoning. This has involved the undertaking of the planning history of each residentially zoned site.

There are 7 no. zoned sites shown below in Figure 3 of which 5 are committed in planning terms (i.e. under construction, granted planning permission but yet to commence and finally where a planning application is awaiting determination).

Figure 3: Location of Zoned Sites



The planning status and location of these 5 committed sites is shown above. The detailed planning history of each of these uncommitted sites is shown in Table 12 below.

Table 12: Residentially Zoned lands under the 2013 LAP already constructed

A. 14/1212 (Newlyn Developments Ltd) – Granted planning permission for the construction of 62 no. residential units on site of c.2.42 hectares. This is now constructed
B. 16/1419 (Knockree Developments Ltd) - Granted planning permission for 14 no dwellings, 6 no semi detached, two storey houses, and 8 no apartments in two storey block with access from Cooldross Lane, modifications to Cooldross Lane and junction with Main Street (R761) buried storm water attenuation tank, and all ancillary car parking, landscaping and site development works on 0.5 ha site. This is now constructed

From Table 13 below it is clear that there are 5 committed sites identified as Sites A to E inclusive and a further 2 sites that are uncommitted. Two of the committed sites have development constructed.

Table 13 below shows a remaining 3 sites currently within the planning system currently awaiting decision.

Table 13: Live applications (152 units in 8.56 ha – density of 17.8 uph)

C. 22/15 (Brookhampton Ltd) – Decision appealed (refused by WCC) for development which consists of the construction of 56 no. residential units, internal roads, car parking, pedestrian and cycle paths, public open spaces and all associated site and infrastructural works to facilitate connections to public services within 2.12 ha site area.
D. 23/60348 (Ciaran and Simon Doyle) - Further Information sought on 27/11/2023 for a proposed new housing development consisting of 46 residential units within 3.2 ha site area.
E. 23/509 (Dwyer Nolan Developments Ltd) - Further Information sought on 26/07/2023 for 50 houses on a site of 3.24 hectares.

From the above and the amalgamation of the two tables (Table 12 and Table 13) we are able to identify the take up of new residential sites against the housing target set in the 2013 LAP.

Table 13: Development Yield from Committed and Non-Committed Sites

A	B	C	D
ID	Granted and Constructed	Live applications yet to be determined	Potential yield of uncommitted residential zoned lands
A (2014)	62 units	-	-
B (2016)	14 units	-	-
C (2015)	-	56	-
D (2023)	-	46	-
E (2023)	-	50	-
Uncommitted R22 zoned lands	-	-	8.5 ha X 22 uph = 187 units
Uncommitted R15 zoned lands	-	-	1 ha X 15 uph = 15 units
Total	76 units	152 units	202 units
Overall yield	430 units from 2013 LAP residential zoned lands		
Existing 2013 LAP	775 units were required in the period between 2011 to 2022, to support a projected population of 5,000 persons.		
Existing 2022-2028 CDP	190 units are to be provided within the period 2020-2031.		

Within Table 13 above, column A identifies the 7 no. new residential sites and sets out their status. Column B indicates that there are 76 units constructed from the 2013 LAP housing target for a population of 5,000 people identified as the target population in the 2013 LAP. Column C shows some 152 units currently in the planning system awaiting a planning decision. Column D shows the potential yield of uncommitted sites that are zoned residential that have not been subject to a planning application. The yield from those sites is 202 units based on a prescribed density from WCC set out in the 2013 LAP. When the number of units from columns B, C and D are added there is a yield partly actual and partly estimated of some 430 units in total. The second row from the bottom in Table 13 indicates that there was a target of future housing units in the 2013 LAP of 775 houses to take the town to its 5,000 population target. The existing LAP states: *'In order to support the projected target population of 5,000 persons, the LAP must provide for an increase in the amount of housing units from 1,402 in 2011 to a total of 2,177 units in 2022, representing a total increase of 775 units.'*

If 775 units was the target and the yield from Table 13 is 430 there remains a requirement for 345 units based on the 2013 LAP. There is likely to be a minimal incursion into this figure of 345 units from infill and town centre redevelopments, conversions etc.

There are two points that follow. Firstly, a requirement for a remaining 345 units is at odds with the 2022 CDP requirement for just 190 units in the period 2022 to 2028 (just 3 years into a new LAP adopted in 2025) set out in the 2022 CDP. Secondly, the 190 requirement would appear to be based on the flawed population projections for the county and the housing allocations given to the County Council by the Government which have substantially been overtaken by the results of the 2022 census. To adopt the 190 **figure** from the 2022 census which comes from flawed population projections and erroneous housing allocations would be to actually reduce the number of housing units projected for the town from an adopted LAP to a reduced CDP housing provision based on inaccurate data in a period, where more, and not less housing, needs to be provided.

The Flawed Basis for Population Projections and Housing Targets

The targets in the County Plan and from which the emerging LAP takes its lead have failed to have regard to the existing population of Kilcoole as counted in the preliminary results of the most recent census completed on 3rd April 2022 and published by the Central Statistics Office on 23rd June 2022; the future population of the area should be projected contemporaneously from the existing population enumerated in Census 2022. The actual size of a household in Ireland; the rate of migration into the State; the rate of obsolescence for existing housing stock; and finally, the actual or likely periods of time for translation of plans for residential use, the grant of planning permission, through to the eventual completion of residential units, should all be used rather than the flawed position on each of these issues used by the ESRI in their projections found to be out of date in any case with regard to the most recent (2023) census results.

We completely understand that the County Council were, and remain 'mandated', not to rely on more recent and more reliable population data but instead on output from the document 'Housing Supply Target Methodology for Development Planning' published by the Minister for Housing, Local Government and Heritage in December 2020 which was based on demand projections contained within the report on 'Regional Demographics and Structural Housing Demand at a County Level' published by the ESRI in December 2020 which was based on the figures available from the 2016 Census and trends from the period 2011 to 2016.

The preliminary census 2022 results available in June 2022 have not been utilised in the formulation of either the County Plan in the period up to its adoption in 2021, nor in the adopted Variation of last year (2022). The 2022 preliminary census results were available from June last year.

Nationally, in just 6 years from 2016 to 2022 the State's population grew by 361,671 or 7.6% nationwide. This growth in the 6 years since 2016 is attributable relatively evenly to natural growth (47%) and net migration (53%) so this is not due to excessive immigration which means that growth can reasonably be expected to grow further, through natural means. By comparison, that there was an increase of over 120,000 housing units nationally over the same period (ie population growth is exceeding the rate of housing provision nationally by a factor of 3 meaning that the gap between people looking for housing and that very provision is widening nationally).

The Housing Supply Target Guidelines state that 'housing completion data is now published by the CSO on a quarterly basis and can be applied to any six-year local authority development plan

period, significantly increasing the frequency with which housing delivery can be benchmarked against identified housing demand projections. This approach is in contrast to the utilisation of population projections which, although important, can only be assessed with one fixed date every five years as part of a national census of population. It is a case in point that the Census due in 2021 has been deferred to 2022, due to the Covid-19 pandemic.’ This is a clear acceptance that the housing targets that the County Councils are to use, including Wicklow County Council, are limited in their accuracy and usefulness in contrast to the rigidity to which they are to be applied and utilised in the formulation of core strategies and the demand for zoned housing land.

It is clear that elements of the methodology/model for identifying housing allocations nationally, and consequently local needs, have to be updated as relevant data becomes available, as was the case when Census 2022 data became available some time later than anticipated in June 2022 as identified above.

The data from Census 2016 and the NPF and RSES projections had been superseded. These projections are based on research by the ESRI, published under the title ‘Prospects for Irish Regions and Counties: Scenarios and Implications’ Research Series No. 70 published January 2018. The baseline net migration assumption used in NPF projections derives from research undertaken by ESRI published as far back as January 2018 entitled ‘Prospects for Irish Regions and Counties: Scenarios and Implications’ that indicate 8,000 net inward until 2021, and 12,500 from then to 2040 are to be used. The CSO record the rate of inward migration to be much higher. In August 2020, the CSO published ‘Population and Migration Estimates’ to the year ending April 2020. For 2018 to 2020, the ESRI estimate was for 24,000 net inward migration (8,000 for each year). The CSO verified a figure at 96,600 over the same period 2018 to 2020, more than four times higher (yes, four time higher!) and Census 2022 results published on 23rd June 2022 confirm this. The submission by this author on the proposed amendments highlighted the large number of refugees, Ukrainian nationals etc in addition to the increasing number of homeless people in the State and the very substantial growth in population actually recorded across the State.

The net migration for the intercensal period 2016 to 2022 is reported to be 190,333, or 31,722 per annum from 2016. It was estimated by the ESRI that in migration would be c15,000 per annum. The reality is twice the amount of the projection over the same period (15,000 versus 31,722) Last year alone the actual figure for in migration was 77,000 albeit inflated by a large influx of Ukrainians. That was an underestimate of 75% (15,000 versus 77,000). This author ventures an opinion that such voluminous and vocal social concern is expressed by protesters nationwide against migrants being accommodated is because it is difficult enough to find accommodation in the State, without a large influx of in migrants, and the planning system and the current zoning regime in particular across the State is not doing anyone any favours.

We are aware that consideration of zoning land at all levels is a political decision. During the course of the adoption of the current CDP substantial de-zoning of residential land was proposed but in several instances elected representatives went against officer advice. Ultimately the Minister and the Department relented and raised no objection to reinstatement or provision of additional residential zoning. The current review of the NPF would strongly suggest that both the Minister and Department are now taking a more flexible approach to zoning and we would ask the planners in the County Council to adopt a similar pragmatic approach. Sweating infrastructural assets, both existing and planned as significant exchequer investment, especially in regard to rail infrastructure provision, should also be carefully considered when assessing the location of future

zoned land.

It should also be noted, as indicated above, that there is a balance between migration and natural growth so this is an important consideration and migrant accommodation is far from the sole issue in regards to housing.

Flawed assumptions from the ESRI

The ESRI projections also assume that the average size of a household throughout the State will remain at 2.8. This ignores the fact that average household size has fallen, on average, by 0.1 every three years since 1966. In the period from 1986 to 2011, the rate was even faster. Longevity, later marriage, fewer children, and more couples with no children suggest a true household size in 2016 of closer to 2.4, rather than 2.8. Nationally, that comprises an unmet housing need for more than 200,000 new homes. The average household size is now 2.6.

Regardless of any population growth or not, any increase in 1-2 person households creates a demand for a significant number of new homes. This demand increases obviously if population grows as is definitely the case in Ireland. The projections, under the HNDA, also assume a rate of obsolescence for existing housing stock of 500 years. This period of obsolescence of 500 years seems unrealistic in the extreme. Also, zoned lands do not represent actually delivered units and existing zoned sites have not come forward for planning never mind been developed. The take up of residentially zoned land also needs to be considered and this is referred to above.

In conclusion, the acceptance of previously used population projections has been critically undermined by the review of the NPF.

Request for a Roads Objection

Our client also requests that a roads objective be contained within the emerging LAP requiring a link road be provided from the existing roundabout on the R774 at Charlesland southwards to the rail station at Kilcoole. This would alleviate congestion in the towns of Greystones, Delgany and Kilcoole whilst improving access to the rail station which is only one of a handful in the county.

We trust you will consider the above in your preparation of the emerging LAP.

We look forward to receiving a copy of that Draft LAP in due course.

Yours sincerely,



Eamonn Prenter MIPI MRTPI

Director

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