



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Capami Limited
Reference:	BRAYLAP-103905
Submission Made	December 18, 2024 3:20 PM

Topic

Compact Growth - Housing – Population Growth

Submission

On behalf of our client, Capami Limited, we hereby make this submission in relation to the Issues Paper published by Wicklow County Council in advance of the publication of the Draft Bray Local Area Plan (The Draft LAP). Please see enclosed document for response to the above considerations.

File

24338 Bray LAP Capami Issues Paper Submission 18122024 FV.pdf, 2.36MB

Submission on the Bray Local Area Plan Issues Paper

In respect of

**Lands at Kilgarron Hill, Parknasilloge, Enniskerry,
Co. Wicklow**

Prepared for

Capami Ltd.

Prepared by

John Spain Associates

December 2024

EXECUTIVE SUMMARY

On behalf of our client, Capami Limited, we hereby make this submission in relation to the Issues Paper published by Wicklow County Council (WCC) in advance of the publication of the Draft Bray Local Area Plan (The Draft LAP).

Our client has a licence from NAMA to develop significant development lands at Parknasilloge, Enniskerry, Co. Wicklow which have been subject to previous planning applications and extensive discussion with WCC. These lands are of significant importance with the potential to deliver much needed housing and meet Core Strategy targets for the next plan period.

It is well documented that the population of the state is growing at a rate which is significantly higher than anticipated and not accurately reflected in the National Planning Framework or corresponding Development Plan Core Strategies. The Draft Revised National Planning Framework was published in July 2024 in response to the results of the 2022 Census and the population projections prepared by the ESRI in August 2024. In November, the government approved revised housing targets for the period 2025 to 2030, aiming to deliver a total of 303,000 new homes across Ireland. This includes an average of over 50,000 homes per year, with ‘a pathway to achieve 60,000 homes annually in 2030 and thereafter’. The Updated Draft Revised National Planning Framework is due to be voted on by the Oireachtas in the near future¹, regional strategies and development plans will be required to be updated in accordance with the updated NPF.

It is respectfully submitted that it is essential that the updates are fully factored into the housing projections of the new LAP.

According to the recent Housing Commission report, which estimates that an additional 1,098,000 to 1,791,000 homes will be required to 2050 on top of the existing c. 1.8 million residential units in the State as of Census night 2022. These increases translate to approximately 42,231 to 68,884 new residential completions required per annum. Therefore, it is essential that the proposed housing target in the LAP reflects the pressing need to deliver a significant quantum of units in the LAP area. The Housing Commission’s report states *“greater costs are associated with underestimating the level of housing required rather than for overestimating it.”*

There exists a clear discrepancy between the Housing Commission estimations published this year and the Draft NPF estimations. The Draft NPF suggests that unmet demand is reflected in its targets, however this is not accounted for in ESRI population projections. The Housing Commission sets out highly significant figures of between 212,500 and 256,000 units of unmet demand.

We respectfully request that lands at Parknasilloge, Enniskerry, previously zoned for residential use in the Bray LAP remain zoned for residential use. As set out within this submission, the residential land-use zoning objective on our client’s lands is entirely appropriate and can be sustainably developed in the short or medium term without significant infrastructure upgrades. Indeed, the proposed residential development on the subject lands has been approved in applications by both Wicklow County Council (subject to current appeal to ABP) and previously by An Bord Pleanála (with the ABP decision currently subject to judicial review). The Action Area provisions include important local improvements and community gain on a plan-led basis including an enterprise and employment hub, a community building,

¹ <https://www.gov.ie/en/press-release/bd039-government-agrees-to-progress-amendments-to-draft-revision-of-national-planning-framework-ambitious-new-housing-targets/>

provision for a school and a Creche. The delivery of the Area Action Plan is highly important for the area.

We also note that the Minister for Housing wrote to the Local Authority Chief Executives in July 2024 requesting local authorities to consider suitable locations for new residential development. The correspondence emphasised the importance of having sufficient zoned and serviced land in order to achieve a sufficient level of output (see Appendix 2).

In summary this submission focuses on 3 main points:

Background to Housing Delivery

- It is recognised that the population of the state is growing at a significantly higher rate than anticipated in the NPF in 2018 and this is not accurately reflected in the 2018 National Planning Framework or corresponding Development Plan Core Strategies. The Draft National Planning Framework was published following the results of the 2022 Census and subsequently the population projections prepared by the ESRI publication population projections. The Updated Draft Revised National Planning Framework is due to be voted on by the Oireachtas in the near future and will require RSES's and development plans to be updated to reflect the increase in population and housing need projections

While we welcome the direction of these updates it is paramount that the housing targets of the Bray LAP reflects the relevant current population and housing data and provides for the quantum of zoned and serviced lands necessary to meet existing and future population needs, including in Enniskerry.

The Provision of Zoned Lands and the Core Strategy

- There is an existing significant shortage of serviced zoned lands in the wider eastern and midlands region. As such there should be no removal of residentially zoned lands in the forthcoming Local Area Plan. The Minister wrote to the Chief Executives of local authorities in July 2024 requesting to consider suitable locations for new residential development. As set out in the Draft NPF *'In setting overall targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers'*.

Housing targets should not be applied as strict caps on housing delivery, instead the Council should encourage development at an appropriate scale and suitable locations in accordance with the principles of the NPF and the RSES. A planning authority may provide additional zoned residential sites in addition to those required to meet the settlement housing supply target. The LAP should provide for a suitable headroom of zoned lands to allow for the delivery of new housing on zoned lands. On this basis it is vital that at least 50% should be applied to residential zoned land requirements.

Principle of Residential Development at Parknasilloge

- The Council should continue to deliver lands in accordance with principle 4 / priority 1 of the Development Plan which priorities the sequential development of lands in towns / villages in the County. Residential development at the lands at Parknasilloge are Tier 1 lands and have been previously found acceptable in permissions granted by An Bord Pleanála (ABP Reg. Ref. 312652, currently subject to JR) and more recently in a separate decision to grant by WCC (WCC Reg. Ref. 22/794 and Reg. Ref. 22/789 currently subject to appeal to ABP 314723 / 314765). Previous

applications have included important community gain through community facilities and employment uses.

TABLE OF CONTENTS

EXECUTIVE SUMMARY

1.0	INTRODUCTION	1
2.0	SUBJECT LANDS.....	2
3.0	POLICY CONTEXT	4
4.0	BACKGROUND TO HOUSING DELIVERY	12
5.0	CORE STRATEGY AND SERVICED LAND	18
6.0	RESIDENTIAL DEVELOPMENT AT PARKNASILLOGE	24
7.0	CONCLUSION.....	28
APPENDIX 1: TIER 1 SITE.....		29
APPENDIX 2: LETTER TO LOCAL AUTHORITY CHIEF EXECUTIVES		32

DOCUMENT CONTROL SHEET

Client:	Capami Ltd
Project Title:	Draft Bray Local Area Plan
Document Title:	Issues Paper Submission

Rev.	Status	Author(s)	Reviewed By	Approved By	Issue Date
DV1	DV1	DF	JS	BC	12/12/2024
F01	F01	DF	JS	BC	18/12/2024

1.0 INTRODUCTION

On behalf of our client, Capami Limited, we hereby make this submission in relation to the Issues Paper published by Wicklow County Council (WCC) in advance of the publication of the Draft Bray Local Area Plan (“The Draft LAP”).

Our client has a licence from NAMA to develop significant development lands at Parknasilloge, Enniskerry, Co. Wicklow which have been subject to previous planning applications and extensive discussion with WCC. These lands are of significant importance with the potential to deliver much needed housing and meet Core Strategy targets for the next plan period.

We respectfully request that lands previously zoned for residential use in the Bray LAP remain zoned for residential use.

The Core Strategy should provide for a suitable headroom and cater for residential lands in excess of the predicted need across the Development Plan period.

As set out within this submission, the residential land-use zoning objective on lands at Parknasilloge, Enniskerry is entirely appropriate and can be sustainably developed in the short term without significant infrastructure upgrades. Indeed, the principle of residential zoning on the subject lands have been accepted by both Wicklow County Council and An Bord Pleanála in recent decisions by WCC and ABP.

1.1 ISSUES PAPER KEY QUESTIONS

The Issues Paper presents a number of areas in to prompt discussion. In this context ‘Housing – Population – Compact Growth’ is considered to be of paramount importance for the forthcoming Local Area Plan.

Within this we note the following sample questions:

‘> Where in Bray and Enniskerry should higher densities be located? How do we deliver higher densities?’

Appropriate densities should be decided on a case by case basis, in accordance with the national guidelines including the Compact and Sustainable Development Guidelines (2024). No strict numeric limits on densities should be applied within the LAP, rather individual densities proposals should be considered in relation to the nature and characteristics of the individual site in question, at application stage.

‘> Where do we deliver our new housing in Bray and Enniskerry without contributing to urban sprawl?’

Tier 1 serviced lands should be prioritised for housing delivery, including lands which are contiguous to the existing urban extent of the town. The suitability of our client’s lands of Parknasilloge Enniskerry, in this regard are discussed within this submission.

2.0 SUBJECT LANDS

Enniskerry is a historical village, with a rich built heritage located 20 km south of Dublin City Centre, 5 km west of Bray and approximately 2.5 km west of the N11. The town is located in close proximity to a number of tourism and heritage attractions including Powerscourt Estate and Gardens.

Enniskerry is accessible via the N11 which is a strategic transport route between Dublin and Wexford. The town is principally served by the R117, which links the town to the N11.

The village is situated at the head of the wooded Cookstown River Valley between the Glencullen and Dargle Rivers, within the foothills of the Sugarloaf, and Wicklow-Dublin Mountains.

The village has an attractive centre and historic streetscape. It provides a range of retail shops and services as well as a number of coffee shops/restaurants and public houses.

The subject site is located at the western side of Enniskerry, approximately 1 kilometre from the centre of the village. The L1011 local road runs along the south of the application site and St. Mary's GAA grounds are generally to the east. The site bounds the Parknasilloge Court residential development. Kilgarron Park residential development is located, opposite the subject site. There is an existing access off the L1011 giving access to Parknasilloge House to the north of the site.

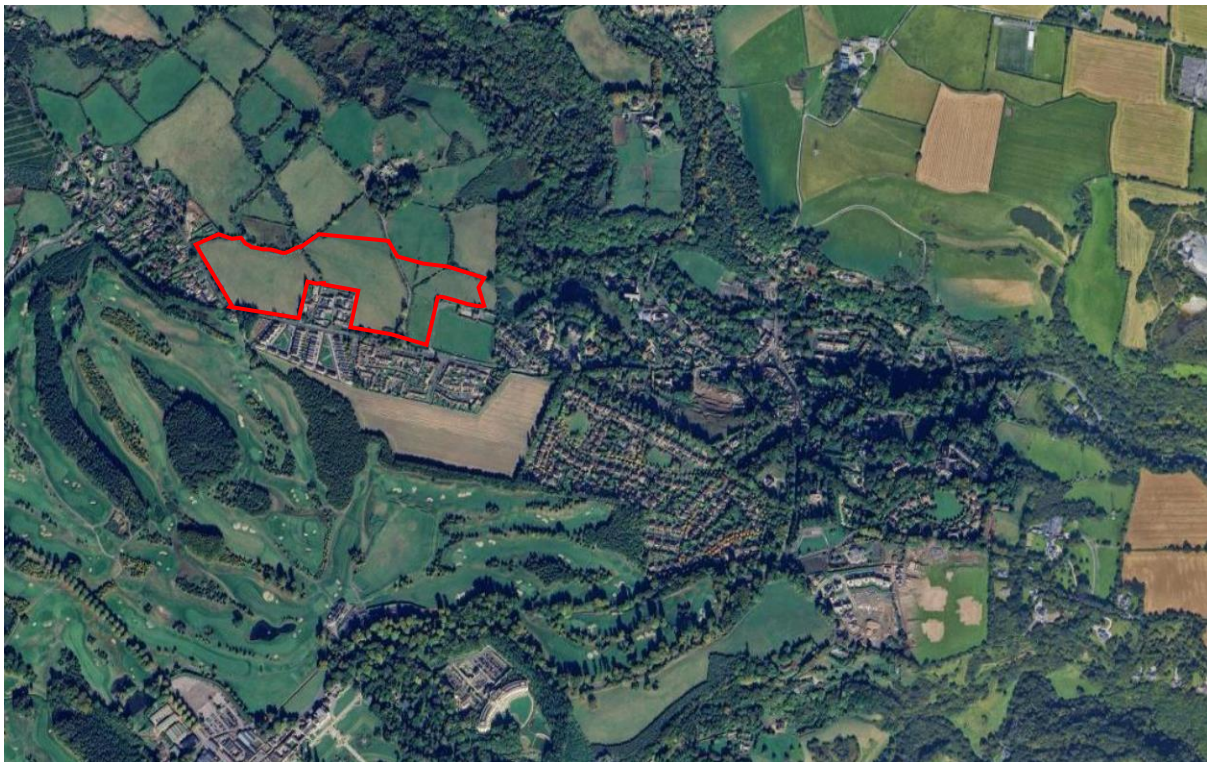


Figure 2.1: Satellite image of subject lands in Enniskerry Context. (Source: Google Maps, 2024)

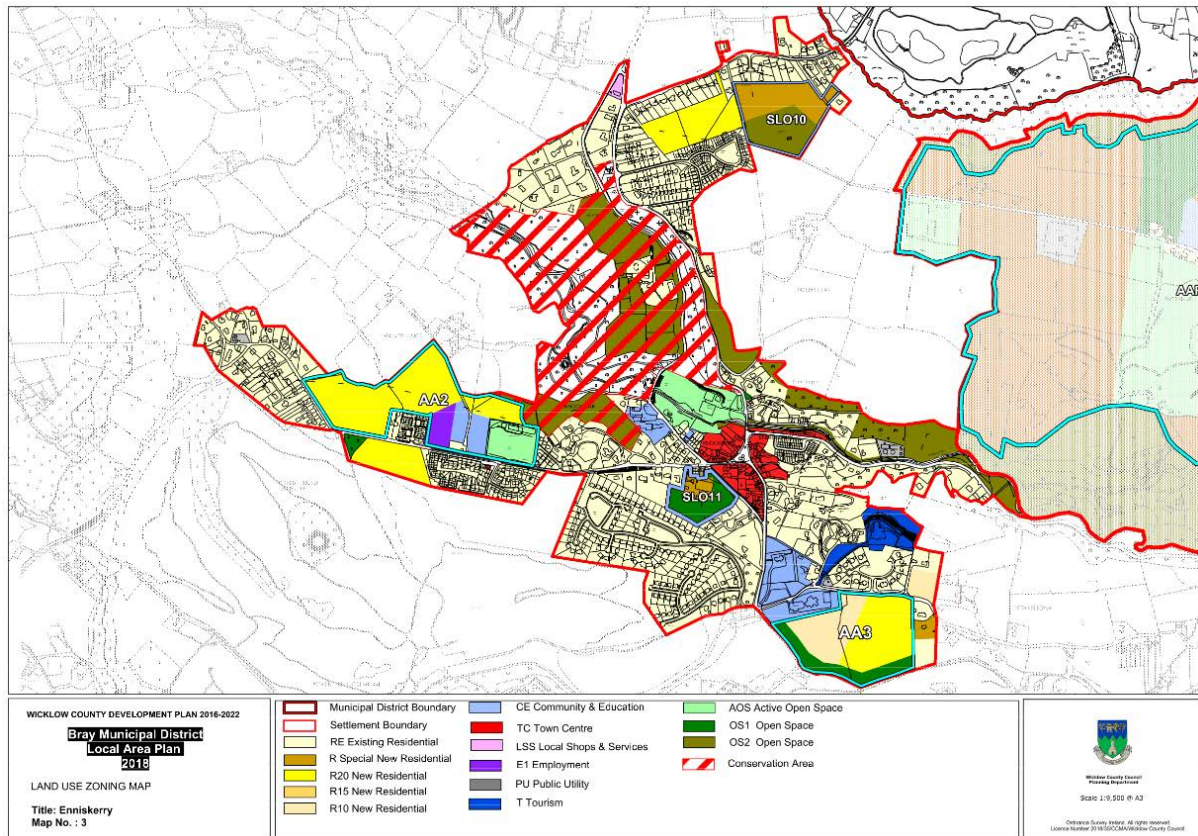


Figure 2.2: Extract of Bray Local Area Plan 2018-2024 Zoning Map.

3.0 POLICY CONTEXT

3.1 NATIONAL PLANNING FRAMEWORK

The National Planning Framework was published in its final form on the 16th of February 2018 following a process of public consultation. The NPF seeks to influence the location of new housing development and future population growth and targets the location of 40% of new housing development within and close to the existing 'footprint' of built-up areas over the lifetime of the framework. This focus on 'compact growth' will continue in the revised NPF.

Objective 3a of the NPF states that it is a national policy objective to *"deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements"*.

In this respect our client's lands are a natural extension of Enniskerry with residential development in the vicinity to the west and to the south, including Parknasilloge Court, in accordance with the strategic direction the National Planning Framework.

As discussed further in this submission the Draft National Planning Framework was published in July 2024 following the results of the 2022 Census and subsequently the population projections prepared by the ESRI publication *'Population Projections the Flow of New Households and Structural Housing Demand'* in August 2024. It is well documented that the population of the state is growing at a rate which is much higher than previously anticipated in the original NPF in 2018. In turn, the Updated Draft Revised National Planning Framework was published in November 2024 and is due to be voted on by the Oireachtas in the near future.²

3.2 THE REGIONAL SPATIAL AND ECONOMIC STRATEGY

The Regional Spatial and Economic Strategy – Eastern and Midlands Regional Assembly is a strategic plan and investment framework to shape the future development of the eastern region to 2031 and beyond. The primary status of the RSES is to support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region.

The RSES is required under the Planning and Development Act 2000 (as amended) to address employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change.

Regional Policy Objective 4.83 states: *"Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans."*

RSES provides for residential development on strategically located sites and to increase densities and urban consolidation. The strategic direction of the NPF and the RSES are clear in this regard, supporting the sequential and compact development in towns such as Enniskerry.

² <https://www.gov.ie/en/press-release/bd039-government-agrees-to-progress-amendments-to-draft-revision-of-national-planning-framework-ambitious-new-housing-targets/>

Once the review of the NPF is complete, the RSES in turn will be required to be updated to reflect the updated population growth targets. The implications of this are discussed further within this document.

3.3 WICKLOW COUNTY DEVELOPMENT PLAN

Adopted in 2022, the Wicklow County Development Plan 2022-2028 sets out the overall strategy and objectives for the County for the plan period. The Planning and Development Act 2000 (as amended) sets out the statutory requirements regarding the content of a development plan which includes details to be required in the Core Strategy.

In turn, the Development Plan acknowledges the requirements of the NPF which identifies compact growth as the first National Strategic Outcome. Specifically, the NPF requires that 40% of all new homes be delivered within the existing built up footprint of settlements. This applies to all scales of settlements within the County, from large towns to villages.

In accordance with the above we note the County's Strategic County Outcomes, SCO1 Sustainable Settlement Patterns & Compact Growth states:

"The delivery of compact growth in all towns and villages by capitalising on the potential for infill and brownfield development, moving away from a reliance on greenfield development and creating places that encourage active lifestyles is essential for the successful delivery of the development plan strategy"

A continuation of this approach is essential in the forthcoming LAP. As widely discussed in this submission there are suitable sites which can support the compact growth of the County and the Bray Municipal Area including our client's lands.

Core Strategy

The Core Strategy must set out projected population growth of cities and towns in the hierarchy, Table 3.1 of the County Development Plan provides for potential growth of 18,075 – 21,575 in the lower growth scenario and 27,575 – 31,075 in the higher growth scenario states:

Table 3.1 Population targets Co. Wicklow 2026, 2031

	2016	2026	2031	Total growth 2016-2031
County Wicklow	142,425	155,000 - 157,500	160,500 – 164,000	18,075 – 21,575
plus 25% headroom (2026 only)		158,144 – 161,269		
plus MASP allocation (2031)			170,000 – 173,500	27,575 – 31,075
of which Bray (min)				9,500

Source: CSO, NPF, NPF Roadmap, RSES, WCC

Figure 3.1: Extract from Wicklow County Development Plan 2022-2028 Table 3.1

Enniskerry is considered a Self-Sustaining Town in the Core Region, which is described as follows: *"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."*

Within Table 3.4, the Development Plan provides a population target of 2,106 people by Q2 2028. We note CSO figures from 2022 state that the population of Enniskerry is presently 2,000 people. Leaving very little room for further growth in the following 6 years.

Depending on the household size this allows for approximately 38 units (2.6 people per household) for the 6 year plan period in Enniskerry without deducting any units presently permitted, under construction or not yet delivered.

However, according to Table 3.5 the housing target for 2016 up to 2031 is 125 units. This figure is considered to be wholly inadequate for the immediate needs of the Enniskerry population and the town will not contribute significantly to the housing needs of the County.

Table 3.4 Wicklow Settlement / Aggregate Settlement Population Targets 2016, Q2 2028

Level	Settlement	Population 2016	Population target Q2 2028	% of total County growth to Q2 2028 by tier	
1	Bray	29,646	38,565	KEY TOWNS	49%
2	Wicklow - Rathnew	14,114	18,515		
3	Arklow	13,226	15,419	SELF SUSTAINING GROWTH TOWNS	25%
	Greystones - Delgany	18,021	21,727		
	Blessington	5,234	6,145		
4	Baltinglass	2,251	2,607	SELF SUSTAINING TOWNS	12%
	Enniskerry	1,877	2,106		
	Kilcoole	4,244	4,778		
	Newtownmountkennedy	3,552	5,179		
	Rathdrum	1,716	2,339		
	Ashford	5,710	6,695	SMALL TOWNS	5%
	Aughrim				
	Carnew				
	Dunlavin				
	Tinahely				
6	Avoca	3,835	4,230		
	Donard				
	Kilmacanogue				
	Newcastle				
	Roundwood				
	Shillelagh				
7-9	Villages / clusters	38,999	41,352	VILLAGES	9%
10	Open countryside			OPEN COUNTRYSIDE	
	Total	142,425	169,658		100.0%

Figure 3.2: Extract from Wicklow County Development Plan 2022-2028 Table 3.4

Table 3.5 Wicklow Settlement / Aggregate Settlement Housing Targets to Q2 2028 and Q4 2031

Level	Settlement	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
1	Bray	11,232	165	100	4,026	771	5,062
2	Wicklow -Rathnew	5,456	650	200	1,267	275	2,392
3	Arklow	5,406	165	100	790	166	1,221
	Greystones - Delgany	6,766	875	400	508	170	1,953
	Blessington	1,914	5	40	393	81	519
	Baltinglass	903	46	40	85	24	195
4	Enniskerry	648	34	40	36	15	125
	Kilcoole	1,451	97	20	140	30	287
	Newtownmountkennedy	1,222	250	100	433	99	882
	Rathdrum	669	132	100	68	31	331
5	Ashford	2,390	255	90	129	41	515
	Aughrim						
	Carnew						
	Dunlavin						
	Tinahely						
6	Avoca	1,534	46	30	114	28	218
	Donard						
	Kilmacanogue						
	Newcastle						
	Roundwood						
	Shillelagh						
7-9	Villages / clusters	15,395	510	134	478	117	1,249
10	Open countryside						
	Total	54,986	3,230	1,404	8,467	1,848	14,949

Figure 3.3: Extract from Wicklow County Development Plan 2022-2028 Table 3.5

The Development Plan states:

“The Core Strategy Tables to follow shows the housing unit requirements for the LAP towns, up to the year 2031 and the housing unit capacity of lands zoned in current LAPs. This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA. Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan”

It is submitted that the Development Plan is already significantly out of date in terms of population and housing need projections. As noted elsewhere in this submission it will in turn be subject to updating in the short term following the adoption of the Revised NPF.

The NPF population projections are intended to be broad estimates not provide precise caps. The Draft NPF in this regard states:

“To account for the possibility of higher net in- migration over the period to 2040, an allowance is made in the NPF to enable ambition and flexibility in planning for future growth. In effect, the Framework needs to plan to accommodate around 950,000 additional people in Ireland between 2022 and 2040, while also making provision for a higher in-migration scenario. Progress towards these targets will be subject to review and further detail on phasing is set out in Chapter 10.

In setting overall targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers. From a long-term, national perspective, the targeted location, relative scale and proportionality of growth will assist in monitoring and assessing delivery and performance.”

2.7 Translating the NPF to City and County Levels

In setting targets for planned future growth, the NPF sets out how we can achieve our overall national, regional and local objectives in a coherent and co-ordinated manner. To ensure that the shared vision is carried through from national, to regional and local level and that there is an effective process of alignment, an updated ‘Implementation Roadmap’ will be published to translate national and regional planned growth projections to city and county levels.

The revised targets will support a plan-led approach to NPF implementation at regional and local level, allowing NPF growth objectives to be incorporated into city and county development plans as they are reviewed. In this regard, matters related to the targeted population and housing numbers and the estimated capacity of each settlement for growth is determined at the plan-making stage, in accordance with the hierarchy of plans prescribed under the Planning and Development Act.

Planned growth at settlement level is to be reflected in the objectives of the statutory development plan, including land use zoning objectives, subject to an appropriate and proportionate element of flexibility in line with statutory guidelines, and will be required to have regard to matters such as appropriate densities to be applied, taking into account the particular circumstances and location.

Accordingly, while plan-led targets at settlement level will inform the plan-making process and thereby form the basis for decision-making, the consideration of individual development proposals on zoned and serviced development land subject to consenting processes under the Planning and Development Act will have regard to a broader set of considerations beyond the targets alone, including where there may be extant, but as yet unimplemented planning permissions.

National Policy Objective 11

Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.

Figure 3.4: Extract from The Draft NPF Section 2.7 (DPLGH, 2024)

Following a decision by Wicklow County Council to refuse planning permission for 98 houses in Greystones on residentially zoned land (WCC Reg. Ref. 23342; ABP Reg. Ref. 317445), on the basis that the town had already reached its population target for 2028. The Irish Times reported that Office of the Planning Regulator stated *“taking into account relevant national planning guidance, in a practical sense, figures [contained in development plans] are generally regarded as broad targets rather than fixed ceilings taking into account the extent of other uncommenced planning permissions and the likely rate of build out”*³

3.4 OTHER RELEVANT OBJECTIVES

In terms of other relevant objectives we note ‘Principle 4: Sequential approach’ states:

“The priority locations for new residential development will be:

Priority 1 In the designated ‘town’ and ‘village’ / ‘neighbourhood centres’ or ‘primary zone’ through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing

³ <https://www.irishtimes.com/ireland/housing-planning/2023/06/02/greystones-planning-decision-has-national-implications-say-home-builders/>

built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.”

The Council should continue to deliver lands in accordance with principle 4 / priority 1. The subject lands can be considered to meet the ‘Tier 1: Serviced Zoned Land’ definition, which is set out in the Development Plan as:

- *This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.*
- *These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*
- *Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.*

In addition we note the following objectives in the settlement strategy:

- *“CPO 4.1 To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into key towns, self-sustaining growth towns, self-sustaining towns and small towns.*
- *CPO 4.2 To secure compact growth through the delivery of at least 30% of all new homes within the built-up footprint of existing settlements by prioritising development on infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites...*
- *CPO 4.5 To ensure that all settlements, as far as is practicable, develop in a self-sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport...*
- *CPO 4.6 To require new housing development to locate on designated housing land within the boundaries of settlements, in accordance with the development policies for the settlement”*

We request that the Council continue to provide for lands in accordance with the above objectives, at locations of existing residential land use zoning objective in Enniskerry which are essential to support the achievement of above objectives. The lands at Kilgarron are contiguous to the existing built footprint of Enniskerry mostly within the CSO boundary (Figure 3.5 below) therefore in accordance with the settlement strategy for the County as set out in the Development Plan. As was established in the applications with decisions to grant by both WCC and ABP, the lands at Kilgarron are Tier 1 under the NPF categorisation of development land. The lands are therefore able to connect to existing development services, including public lighting, foul sewer drainage, surface water drainage and water supply and are contiguous to existing developed lands. Housing can be readily delivered at this location without any significant infrastructure upgrades.

As further discussed in this submission, the previous applications on the lands were considered acceptable in principle. These proposals also included important community infrastructure and employment uses, as required by the Area Action Plan contained in the

previous LAP. Future applications will again require the same level of provision which is considered highly important for Enniskerry.

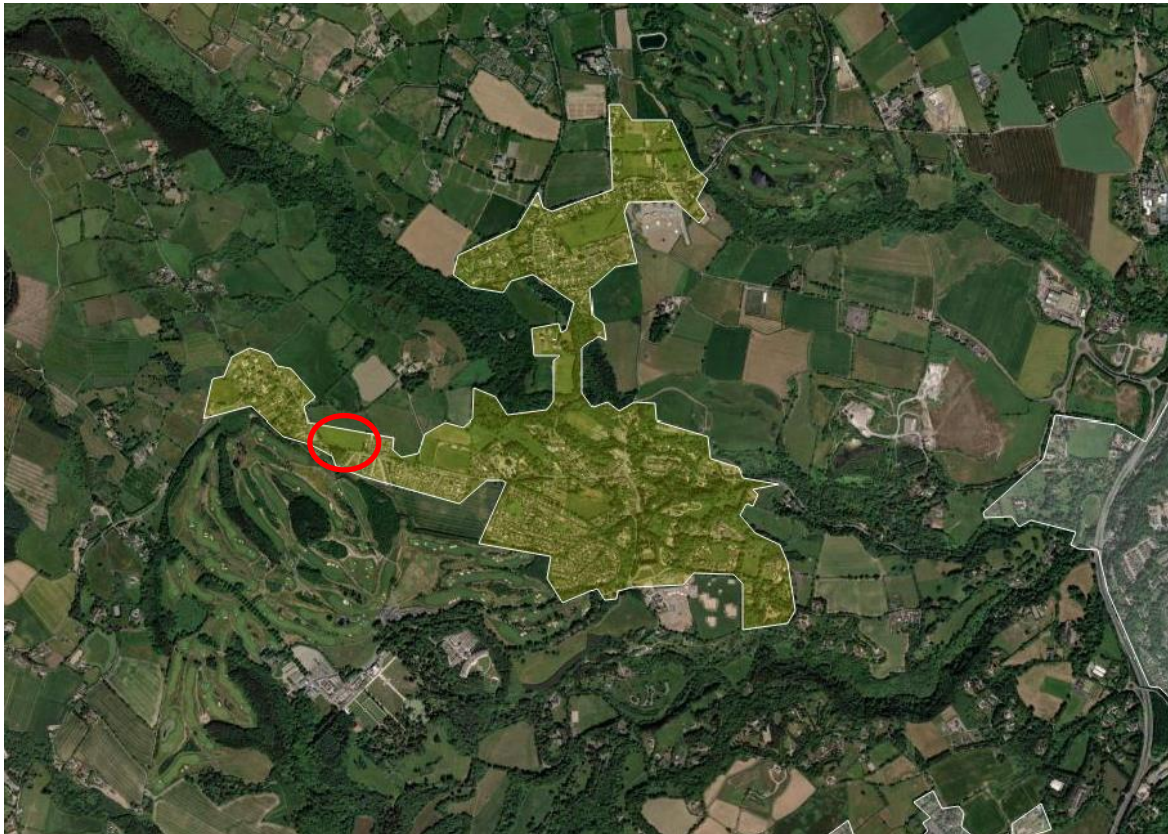


Figure 3.5: Extract from CSO Interactive Mapping illustrating Enniskerry CSO Boundary (CSO, 2024)

3.5 DEVELOPMENT PLANS – GUIDELINES FOR PLANNING AUTHORITIES (JUNE 2021)

The Development Plan Guidelines for Planning Authorities (2021) set out important guidance for the zoning, identification of land use strategies, phasing and sequencing of development. This is of relevance, as the Local Area Plan is setting out the zoning framework and overall form of Enniskerry.

A clear methodology is provided for the preparation of the housing demand and zoning requirements across all settlements within the subject area. In particular, a settlement capacity audit will therefore comprise housing estimates for Tier 1 and Tier 2 serviced 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.”

Therefore, it is submitted that the existing and suitably located Tier 1 residential zoned lands previously identified in Enniskerry could appropriately contribute towards the identified housing need for the town and the consolidated development of the area, as advocated by the DPGs and further explored in the following sections.

4.0 BACKGROUND TO HOUSING DELIVERY

There are a number of fundamental issues impacting the preparation of planning policy in Ireland which must be carefully considered by the Local Authority in preparing the forthcoming Draft LAP. Primarily these relate to the Draft NPF, the population projections prepared by the ESRI, unmet housing need, household size and levels of housing activation.

It is crucial the Council take cognisance of these issues in preparing the new LAP to ensure housing delivery in the area is not impacted.

4.1 DRAFT NATIONAL PLANNING FRAMEWORK

The Draft National Planning Framework was published in July 2024 following the results of the 2022 Census and subsequently the population projections prepared by the ESRI publication *'Population Projections the Flow of New Households and Structural Housing Demand'* in August 2024. It is well documented that the population of the state is growing at a rate which is much higher than previously anticipated.

We welcome the publication of the updated Draft National Planning Framework (NPF) Revision in November 2024. While the uplift in the population projection figures to 6.1 million is welcomed, we consider that this projection is still somewhat conservative given recent growth rates.

In this context it is critical that the population projections and housing provision targets contained in the regional and local Development Plans are not seen as a ceiling or cap, but rather as a minimum level of housing supply that is needed.

In turn, the Updated Draft Revised National Planning Framework was published in November 2024 and is due to be voted on by the Oireachtas in the near future.⁴

The population figures produced in the ESRI publication underpin the population projections used in the updated Draft Revised National Planning Framework ("the Draft NPF"). As stated in this report, the ESRI report states that it deals with 'structural demand' – which is future demand based on population growth and the ESRI report makes it clear that it does not consider existing pent-up housing demand of c. 235,000 which the Housing Commission identified in their report (discussed further below). In other words, the deficit issue needs to be considered appropriately in setting revised and increased national targets in the NPF.

The Draft NPF includes an uplift in annual projections to 50,000, it is respectfully submitted that this figure falls far short of the housing supply that is likely to be required over the lifetime of the plan when compared to the projections of the housing commission and when the existing unmet housing need is accounted for which relates to some 235,000 units (as the midpoint figure used by the Housing Commission). Whilst the recognition of the need to include pent up demand in the indicative target of 50,000 homes per annum is a significant step in the right direction, it clearly would make very limited inroads into the existing pent-up demand. Assuming the existing housing shortfall is now at least 240,000 units, delivering an additional 6,000 per annum to meet pent up demand will result in taking 40 years for this existing unmet housing need to be addressed. There is therefore a need to further increase housing targets in short term to address existing pent-up demand in a meaningful way. There is also a need for the Bray Municipal District LAP to take full account of existing unmet housing need in County Wicklow.

⁴ <https://www.gov.ie/en/press-release/bd039-government-agrees-to-progress-amendments-to-draft-revision-of-national-planning-framework-ambitious-new-housing-targets/>

At a national level, Table 10.1 of the NPF in 2018 provides an overview of the population growth targets of the NPF phased over three staged intervals – 2026, 2031 and the target year of 2040. The table also breaks down the targeted growth per regional assembly before giving a total population projection for the State. The Draft NPF revision seeks to amend Table 10.1 to increase the national population growth target from 5.8 million to 6.1 million by 2040, which proportional regional increases factored in. The Draft Revision does not include interval target years of 2026 and 2031 with a singular intermediate target of 2030 supplied.

Figure 4.1: Current NPF Targets (2018)

Region	2026 NPF Targeted Population Growth	2031 NPF Targeted Population Growth	2040 NPF Targeted Population Growth
Eastern and Midland	240,000 - 265,000	335,000 - 375,000	490,000 - 540,000
Northern and Western	65,000 - 75,000	100,000 - 110,000	160,000 - 180,000
Southern	155,000 - 170,000	220,000 - 245,000	340,000 - 380,000
State Total Growth	460,000 - 510,000	655,000 - 730,000	990,000 - 1,100,000
State Total Population	5,220,000 - 5,275,000	5,415,000 - 5,490,000	5,750,000 - 5,860,000

Source: Table 10.1 of the NPF

Figure 4.2: Phase Population Growth (2024)

Region	2030 Growth	%	2040 Growth	%
EMRA	270,000	49%	470,000	49%
NWRA	85,000	15%	150,000	15%
SRA	195,000	35%	330,000	35%
State Growth	555,000		950,000	
State Total Population	5,700,00		6,100,000	

Source: Table 10.1 – Updated Draft Revised NPF (November, 2024)

Table 10.1 of the Draft Revision indicates that within the first 8 years from the 2022 Census, Ireland's population is projected to grow by c. 550,000 people (from 5,149,139 in 2022 as per the CSO). By 2040, this projected growth will rise to almost 1 million people on the 2022 baseline, with a targeted population growth of 950,000, giving a final estimated population projection for the State of 6.1 million in 2040.

Under the Draft Revision, as per the amended Table 10.1 above, the Eastern and Midland Regional Assembly (EMRA) is to accommodate c. 49% of national population growth.

It is clear from the above that the draft NPF revision sets out a distinct and coherent policy approach for the targeted growth and spatial distribution of population nationally, which can be filtered appropriately for respective regional and local growth targets.

4.2 POPULATION PROJECTIONS

The ESRI report⁵ *Population projections, the flow of new households and structural housing demand*, published in 2024, provides estimates of structural (demographic) housing demand at a regional level. The report does not estimate ‘total housing demand’ which includes this structural element as well as ‘pent-up’ demand which includes the gap between supply and demand on a recurrent historical basis or the accumulation of unmet housing need.

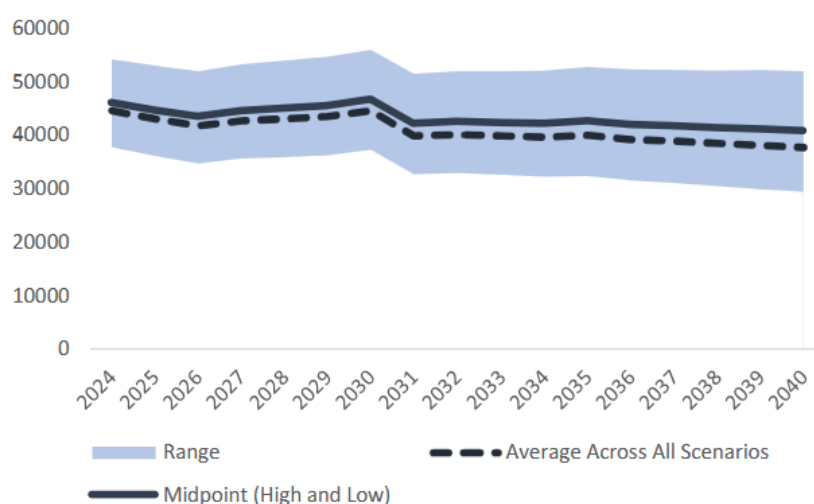
The report outlines that Ireland has experienced rapid population growth in recent years, both compared to historical experience and relative to the EU. Census 2022 data reveals that the population was 5.184 million, having increased by 422,000 or by 9 per cent since 2016. The ESRI report acknowledges that: ***“many previous population scenarios for Ireland have underestimated population growth over the short term. Net migration is the key driver of population change in Ireland and net migration flows have been very strong in recent years.”***

The ESRI states that *‘at a regional level, while all regions are expected to experience population growth over the projection horizon, the Eastern and Midlands region is expected to experience relatively higher growth, concentrated in the Dublin and Mid-East regions.’* At a national level, the population grew at an annual average growth of 1.312 per cent between 2016 and 2022 whereas the Eastern and Midlands region experienced the strongest growth of 1.6 per cent (driven especially by growth in the Mid-East).

According to the ESRI, at a national level, in the baseline population scenario, *“the population is expected to increase by 922k between 2022 and 2040, resulting in a total population of over 6.106 million people by the end of the period.”*

It is important to note that the report uses two headship assumptions, 2.8 people per household which is based current (2022) trends and a fall in household size to 2.6 people per household. Figure 4.5 of the Report illustrates the range of scenarios presented, based on a series of assumptions discussed by the authors.

FIGURE 4.5 RANGE OF HOUSEHOLD DEMAND BASED ON ALL SCENARIOS



⁵ Bergin, A., and Egan, P. (2024). *Population projections, the flow of new households and structural housing demand*, ESRI Research Series 190, Dublin: ESRI <https://www.esri.ie/publications/population-projections-the-flow-of-new-households-and-structural-housing-demand>

Figure 4.3: Extract from ESRI report '*Population projections, the flow of new households and structural housing demand*' (ESRI, 2024)

The Report states that in the high international migration population scenario, estimated structural housing demand for the same 2023–2030 period ranges from 40,700 to 53,000 (47,000) p.a., assuming a fall in household size/increase in headship. As noted by the researchers '*factoring in prevailing pent-up household demand is beyond the scope of this research*'. The report acknowledges that if the demand is not met, it can accumulate in subsequent years.

However CSO research clearly illustrates that demand has not been met in several years resulting in an existing, significant pent-up demand dating back to the fiscal/housing crisis following the Celtic Tiger period. The ESRI report does not address this issue of pent up demand. There is significant chance that updated 2040 projections also undershoot actual future population growth.

On the 27th of August 2024, the CSO published population and migration estimates in the 12 months to the end of April 2024, which outlines that the population in Ireland rose by 98,700 people which was the largest 12-month increase since 2008⁶. The CSO (Population and Migration Estimates – August 2023 and 2024) estimates that the population of the State increased by c. 196,300 people (or 3.7%) between April 2022 and April 2024 which suggests that c. 78% of the draft NPF revision's uplift of 250,000 people between 2022-2040 has already been reached in the past 2 years (i.e. 196,000/250,000).

The CSO estimated population growth over the past 2 years would amount to c. 20.6% of the total population growth projected to 2040 by the draft NPF revision already accounted for within the first 2 years of an 18-year period to 2040. In summary the above considerations indicate that the population projections underpinning the Draft NPF are underestimating the likely population growth and the corresponding need for housing in the state.

⁶ Population and Migration Estimates, April 2024 website:
<https://www.cso.ie/en/releasesandpublications/ep/p-pme/populationandmigrationestimatesapril2024/keyfindings/>

4.3 EXISTING UNMET HOUSING NEED (PENT-UP DEMAND)

According to the recent 'Report of The Housing Commission', an additional 1,098,000 to 1,791,000 homes will be required to 2050 on top of the existing c. 1.8 million residential units in the State as of Census night 2022. These increases translate to approximately 42,231 to 68,884 new residential completions required per annum.

The prudent approach is to plan for a higher population target so as to not unintentionally restrict or cap the supply of critical homes through the under provision of serviced lands capable of delivering homes, should the high international migration trend continue.

The Housing Commission has estimated that, as of the 2022 Census, there was an existing housing deficit in 2024 of between 212,500 and 256,000 homes (with a mid-point figure of 235,000 used). Several aspects of the housing system, evident to most observers, suggest a significant housing deficit.

The Commission states that: *'A major issue of concern to the Housing Commission is Ireland's housing deficit. This refers to housing that has not been built despite an underlying social requirement. It is reflected principally in suppressed household formation and thus artificially elevated measured household size.'*

The Commission recommends that this be addressed as a matter of urgency and not simply added into longer-term housing requirements. The roots of the under-provision of housing date back to the mid-1990s, but the bulk of the housing deficit has come about primarily due to very low housing output in the decade following the financial crisis from 2008. One of the key findings of the Housing Commission's analysis is that current household size is artificially elevated due to housing scarcity. While the 2022 Census indicates a household size of 2.74, the Housing Commission and other commentators, believes the household size is significantly below this.

Figure 2.1: Representational graph to address housing deficit within a decade

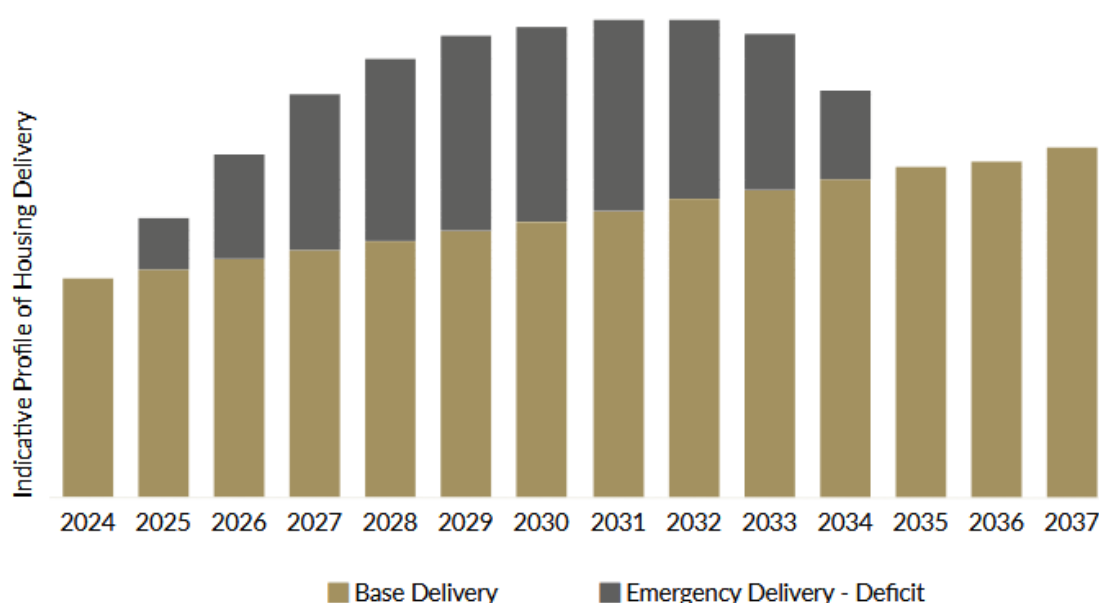


Figure 4.4: Extract from Housing Commission Report Figure 2.1 (The Housing Commission, 2024)

The figures in Table 2.2 provide the annual average housing requirement over the 2024-2050 period based on the same five potential outcomes for population in 2050, six potential outcomes are set out, based on varying average household sizes.

Table 2.2: Average annual housing requirements 2024–2050 under alternative scenarios, assuming 0.5% obsolescence, including any housing deficit

Household size 2050	Population in 2050				
	6.25 million	6.50 million	6.75 million	7.00 million	7.25 million
2.4 persons	33,400	37,600	41,700	45,800	49,900
2.3 persons	37,900	42,200	46,500	50,800	55,100
2.2 persons	42,800	47,300	51,800	56,300	60,800
2.1 persons	48,200	52,900	57,600	62,300	67,000
2.0 persons	54,100	59,000	64,000	68,900	73,800
1.9 persons	60,600	65,800	71,000	76,200	81,400

Source: Housing Commission
Figure 4.5: Extract from Housing Commission Report Table 2.2 (The Housing Commission, 2024)

Table 2.3 of the Housing Commission Report '*New Dwellings Required by Local Authority and Scenario*' states that Wicklow requires between 20,000 - 34,000 to 2050. Depending on the exact quantity of population growth for the state to either 6.5 – 7 million.

As evident from the above considerations, the need for additional housing delivery in County Wicklow including the town of Enniskerry, to cater for anticipated population growth over the next plan period are well documented and hugely important.

As such there should be no removal of residentially zoned lands in the forthcoming Local Area Plan. In turn, the Wicklow Development Plan will need to be updated to reflect the increased population and housing need projections in the Draft NPF.

5.0 CORE STRATEGY AND SERVICED LAND

The Minister wrote to Local Authority Chief Executives in July 2024 requesting Local Authorities to consider suitable locations for new residential development to help address national housing need (see Appendix 2 for letter). The letter highlighted the importance of having sufficient zoned and serviced land to meet projected housing needs. Importantly the letter requests planning authorities to “have regard to the quantum and rate of take up of zoned and serviced land”. In other words, to appropriately reflect actual housing development rates on zoned land and provide appropriate ‘headroom’ in the quantum of zoned land.

The letter by the Minister stated:

“An important facet of reaching that level of output is ensuring that there is sufficient zoned and serviced land available at suitable locations to facilitate the development of housing and sustainable communities. In the period pending finalisation and approval of the updated National Planning Framework, it would be appropriate for each planning authority to undertake a preliminary assessment of the quantum of zoned and serviced land within their administrative area that is available for residential purposes and to estimate the overall housing capacity of such lands.”

The Minister also states:

“Any future proposals relating to the zoning of land must be evidenced-based, justified, and consistent with relevant national and regional development policy. In this regard, I would note that the assessments should have regard to the quantum and rate of take-up of zoned and serviced land on the one hand, and suitability on the other, taking account of the settlement hierarchy; servicing requirements and transport accessibility, in particular accessibility to high capacity transport options; environmental considerations and community and sustainable development considerations, of any new lands to be considered.”

Similarly, the Housing Commission’s Report provides import commentary on the preparation of Core Strategies by local Authorities:

*“The Housing Commission considers that the methodology of determining the Housing Supply Targets, including not factoring the housing deficit estimates into the methodology for development planning, **has resulted in an underestimation of the true housing requirement**. Local authorities take different approaches to categorisation for zonings, but it is possible to use the ‘generalised zoning type’³⁵ used by the DHLGH to analyse the amount of undeveloped residential land in each local authority.”*

Footnote 35 refers: *The Department of Housing, Local Government and Heritage uses the ‘Generalised Zoning Types’ which represents zoning data from development plans and local area plans in a consistent scheme for all local authorities on its Zoning Map Viewer*

Recommendation #2 highlights the urgency of moving to a stable methodology for assessments of housing requirement.

Section 3.5 of the Report discusses Housing Delivery Targets. the Housing Commission has found that the NPF targets are an underestimation of Ireland’s housing requirements necessitating the present review.

Based on housing requirements analysis, the Housing Commission believes that housing delivery needs to be scaled up to meet housing requirements, along with targeted

coordination, access to land for housing and infrastructure, guaranteed funding, and additional resourcing of skilled people to facilitate a sustainable output of housing on strategic sites.

We respectfully submit that this should include ensuring local authorities treat Core Strategy figures as minimum targets and not as caps ensuring that the appropriate quantum of residential land is zoned including necessary headroom reflecting the actual rate of take up of zoned land.

5.1 SERVICED LANDS

Goodbody⁷ published a report on residential land availability in September 2024. This outlines that there is insufficient zoned serviced land in the eastern and midlands region to meet updated housing supply targets over six years. The report estimates that there is a need for as many as 60,000 units a year over this period to deal with an existing shortfall of supply as well as forecast population growth.

In particular, the eastern and midlands region of the Republic has a shortage of residential zoned and serviced land to meet development needs over the next six years to the tune of 40,000 to 70,000 units in EMRA (19-35% above current estimated residential land yield).

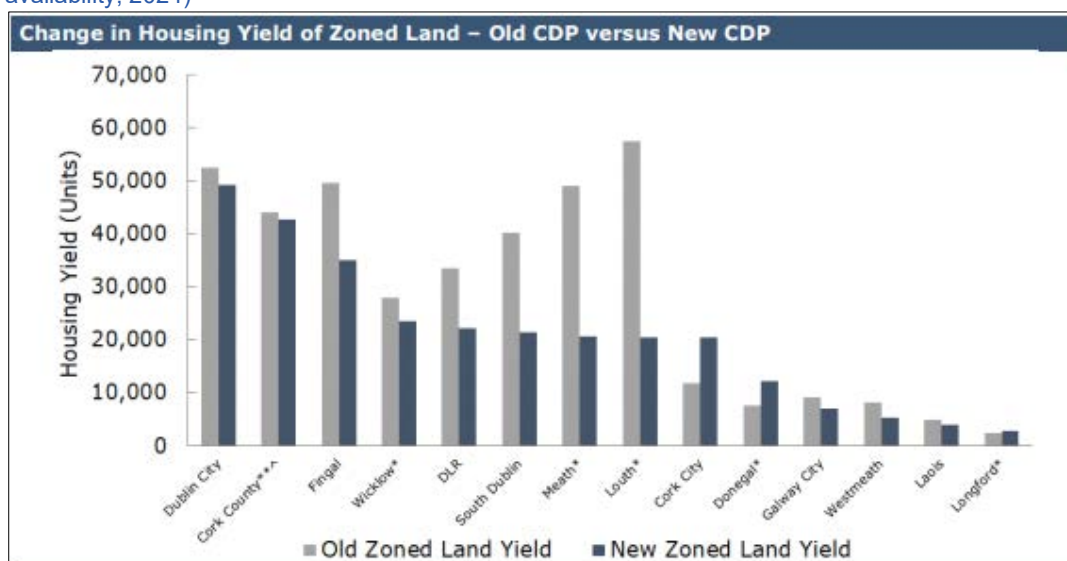
Goodbody have analysed the change in the quantity of zoned land across the current development plan period and the previous plan period. Ensuring that sufficient zoned land is available is crucial to achieving housing supply targets. This deficiency in turn acts as a constraint on the supply of new units during the lifetime of the CDP, as any new development needs zoned and serviced land before it can begin.

The report outlines that it is critical that there is enough zoned serviced land if the nation's housing needs are to be met. The report highlights that on an aggregate basis, *"the total housing yield of zoned land in our sample has fallen by 111,461 units in the current CDP period relative to the previous one (falling from 398,365 to 286,904). This decline represents a 28.0% decrease."*

Furthermore, the Goodbody report identifies that the EMRA region once again has a very significant role in the reduction in zoned lands nationally stating that *"This restricted EMRA sample (which excludes Offaly and Kildare) saw a reduction in the housing yield of zoned land of 37.2%, equating to a decrease of 121,027 units over the 6-year plan period (falling from 325,604 to 204,577). The four councils which comprise the Dublin region (Fingal, Dublin City, Dún Laoghaire– Rathdown and South Dublin) saw a fall of 27.2% in housing yield of zoned land between the new and old plan period."*

⁷ https://www.goodbody.ie/wp-content/uploads/Goodbody_Residential-land-availability-report_online_Sept24.pdf

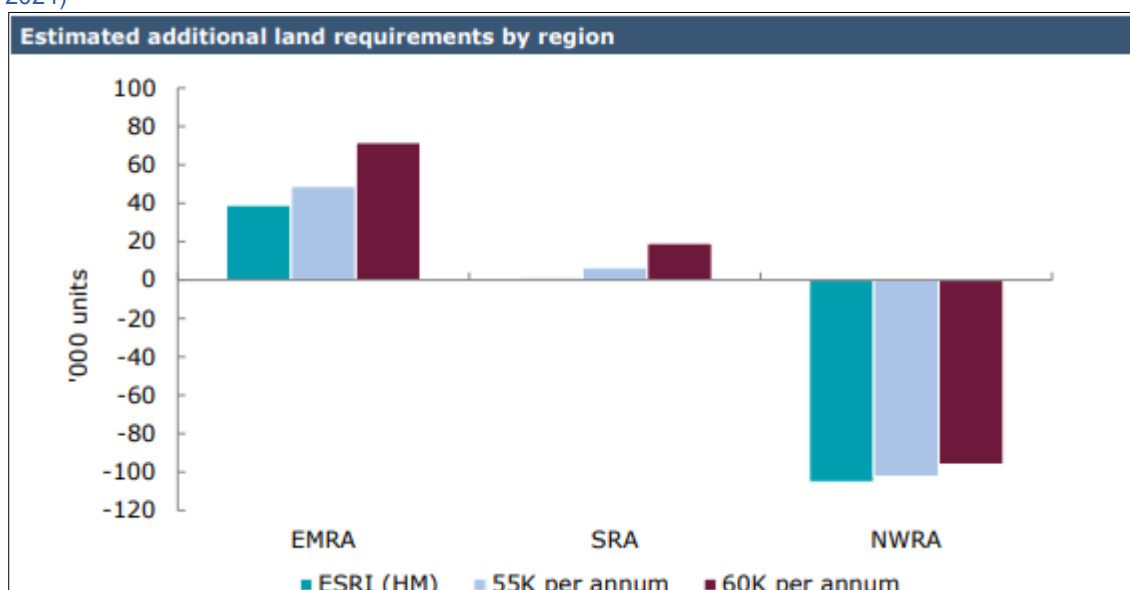
Figure 5.1: Change in Housing Yield of Zoned Land Old CDP v New CDP (Source: Goodbody Residential land availability, 2024)



Source: Goodbody 2024

Goodbody estimate that there is a shortage of zoned, serviced land in EMRA over a six-year development plan period to meet housing requirements of between 40K-70K, taking account of current permitted units and the need to provide a buffer over and above the estimate of housing requirements.

Figure 5.2: Estimated Additional Land Requirement by Region (Source: Goodbody Residential land availability, 2024)



Source: Goodbody 2024

In accordance with the conclusion of the Report of Housing Commission, Goodbody also shares the view that household size used in housing need projections is artificially inflated which has significant consequences for housing need projections, the report states that:

“To convert population estimates into household projections, important assumptions are made in relation to obsolescence and household size. The ESRI’s analysis presents a range of scenarios around these variables. The analysis, however, does not account for the existing housing deficit, estimated by the Housing Commission to be c.235K units. The key difference

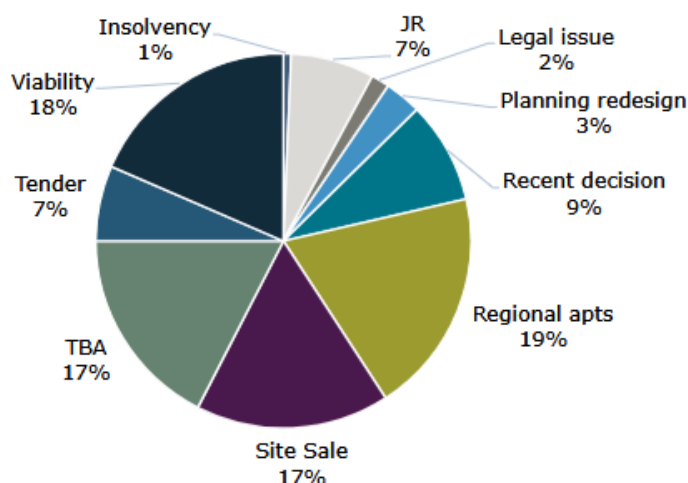
here is in relation to assumptions around household size and headship rates by age cohort. It is the Housing Commission's view, which we share, that the average household size in Ireland is artificially inflated due to the lack of housing supply since the Global Financial Crisis (GFC) in particular. Taking account of this yields an estimate of housing requirements in excess of 50K per annum. We model for two additional scenarios – 55K and 60K per annum – in this report.”

The report presents a detailed analysis of population and housing requirements, and in particular of zoned land requirements in Ireland, as a contribution to the preparation of an updated National Planning Framework. The report concludes that there is a significant shortfall in the amount of zoned land in Ireland, particularly in the Midland and East Region.

5.2 HOUSING ACTIVATION

The Report also discusses reasons for non-commencement of large scale applications during the lifetime of the application. A significant proportion of the surveyed permissions were not activated. Reasons for this include physical infrastructure such as roads and water, as well as social infrastructure such as schools and community facilities. In our experience many permissions will not be delivered during the plan period.

Reasons for non-commencement of approved SHD applications



Source: Mitchell McDermott

Figure 5.3 Reasons for non-commencement of approved SHD applications (Source: Goodbody Residential land availability, 2024)

While Tier 1 lands are supposed to have services in place to accommodate residential construction immediately often some local upgrades are required or other considerations mean that due to factors outside the control of the Applicant, the permission is not carried out. An increased focus on coordinated infrastructural delivery and a speeding up of the planning process also need to be part of the process of higher activation of residential sites

Local Authorities are responsible for ensuring that there is sufficient zoned and serviced land available to meet housing targets over a Plan period. As required in the Development Plan guidance a buffer “not exceeding 25%” can be added to this land provision.

The Goodbody analysis of planning and commencements data since 2016 shows that the buffer needs to be significantly larger if housing supply targets are to be met. Many sites will not obtain planning permission or, where there is a permission not be completed due to issues including planning, services and viability issues. On this basis it states that it is vital that a buffer of at least 40% (i.e. headroom) should be applied to available land requirements.

Section 4.4.3 of the Development Plan Guidelines (DPGs) recognises that additional land should be zoned over and above the projected housing demand for that settlement stating:

“In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.”

The DPGs confirm that after identifying the site/land requirements to meet a housing supply target for a settlement, the Planning Authority may also identify additional sites/lands to “ensure sufficient choice for development potential is safeguarded.”

It is submitted that 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 additional ‘headroom’ is required in this regard. The Guidelines state:

“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.”

To ensure sufficient provision of housing land/sites, the DPGs include an allowance for ‘Additional Provision’, of 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. This assumes that 75-80% of all zoned land in an area obtains planning permission, has the necessary infrastructure immediately available and is fully developed with completed housing units in a 6 year period. However this level of ‘additional provision’ has been proven to be insufficient and does not reflect actual take up or activation rates of zoned lands, as evidenced by the Goodbody Report. In particular activation rates are typically in the range of 20-50% of zoned land in any 6 year period.

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

However, even with the provision of 20-25% excess or headroom is well short of what is required to enable housing need to be met within a 6-year plan period. A headroom of at least 50% is more appropriate having regard to typical activation rates. This can only be addressed by additional zoning of land for ‘new residential’ over and above that included in the Draft LAP.

6.0 RESIDENTIAL DEVELOPMENT AT PARKNASILLOGE

It is important to note that both Wicklow County Council and An Bord Pleanála have accepted the principle of residential development at this location and issued decisions granting planning permission for residential development at Parknasilloge. An Bord Pleanála granted a SHD on the site (ABP Reg Ref. 312652) which is currently subject to a judicial review challenge. Most recently, 2 No. concurrent applications were submitted on our client's lands in July 2022 and were subsequently issued decisions to grant permission by Wicklow County Council under Reg. Ref. 22/794 and Reg. Ref. 22/789. Both are presently pending decisions with An Bord Pleanála following Third Party Appeals (ABP Reg. Ref. 314723 / 314765).

In their assessment of Reg Ref 22/794 WCC stated:

"In accordance with the County Development Plan and the Bray Municipal District Local Area Plan 2018 and having regard to the zoning objectives for AA2 Parknasilloge, it is considered that the principle of development of 98 dwellings, an enterprise and employment hub including incubator business units/offices and cafe unit (2,752sqm), Community building and Childcare facility childcare facility would be acceptable once the proposed development achieves all other relevant development criteria and objectives as outlined in the Bray Municipal District Local Area Plan 2018-2024 and the Wicklow County Development Plan 2016-2022."

The applicant addressed previous reasons for refusal including Hydrological Assessment Report and Natura Impact Statement that addressed concerns raised by the Department of Culture, Heritage and the Gaeltacht (NPWs) as well as updated Engineering reports and details.

Previously a Strategic Housing Developments for 219 no. residential units (135 no. houses, 84 no. apartments), childcare facilities and associated site works was granted by An Bord Pleanála. This decision is currently subject of judicial review.

In their assessment An Bord Pleanála of SHD 312652 stated that:

"In conclusion, having regard to the scale and nature of the development proposed and the current statutory plans for this area, the residential and crèche uses proposed on this site are currently acceptable, and I am satisfied that the proposed development would not materially contravene the Local Area Plan in relation to land- use zoning objectives for the site"

In conclusion, the Inspector considered that:

"The Board considered that, subject to compliance with the conditions set out below, the proposed development would constitute an acceptable quantum and density of development in this accessible urban location, would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would be acceptable in terms of urban design, height and scale of development, would be acceptable in terms of impacts on traffic and pedestrian safety and convenience, and would provide an acceptable form of residential amenity for future occupants."

The Inspector considered that the development was consistent with Government policies, as set out in the National Planning Framework, in particular national policy objectives 13 and 35, provisions set out in the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031, the Sustainable Urban Housing: Design Standards for New Apartments, in particular Specific Planning Policy Requirements 1, and the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.

6.1 SEQUENTIAL DEVELOPMENT

The strategic consolidation of urban development to the west of Enniskerry is sequentially preferable and in accordance with the sequential approach set out in the Development Plans – Guidelines for Planning Authorities (2021) and cost effective to services (as Tier 1 lands) as existing cycling, footpath and road infrastructure is in place and can be easily serviced as well as providing additional links to the town centre.

The DPGs set out important guidance for the zoning, identification of land use strategies, phasing and sequencing of development. This is of relevance, as the Local Area Plan is setting out the zoning framework and overall form of Enniskerry.

A clear methodology is provided for the preparation of the housing demand and zoning requirements across all settlements within the subject area. In particular, a settlement capacity audit will therefore comprise housing estimates for Tier 1 and Tier 2 serviced 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.”*

The lands at Parknasilloge are Tier 1 under the NPF categorisation of development land. The lands therefore can connect to existing development services, including public lighting, foul sewer drainage, surface water drainage and water supply and are contiguous to existing developed lands. Housing can be readily delivered at this location without any significant infrastructure upgrades.

As previously set out, the lands at Kilgarron are contiguous to the existing built footprint of Enniskerry mostly within the CSO boundary (Figure 6.1 below) therefore in accordance with the settlement strategy for the County as set out in the Development Plan. As was established in the applications with decisions to grant by both WCC and ABP, the lands at Kilgarron are Tier 1 under the NPF categorisation of development land.

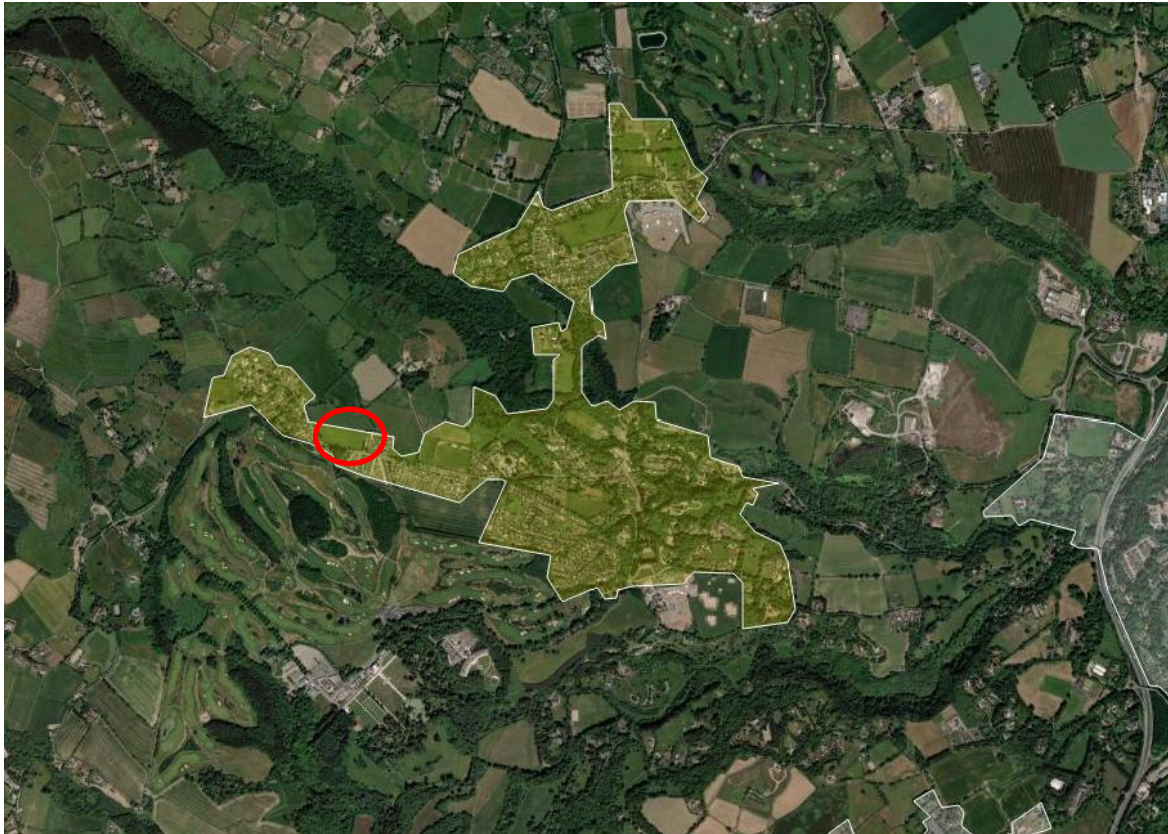


Figure 6.1: Extract from CSO Interactive Mapping illustrating Enniskerry CSO Boundary (CSO, 2024)

Therefore, it is submitted that the existing and sequentially located Tier 1 residential zoned lands at Parknasilloge can appropriately contribute towards the identified housing need for the town and the consolidated development of the area, as advocated by the DPGs and further explored in this submission.

As part of this submission JSA have prepared a brief Settlement Capacity Audit (SCA) in relation to our client's lands at Parknasilloge and other sites in Enniskerry as part of Appendix 1. A SCA will be required to be prepared as part of the Draft LAP.

Given its designation as a 'Self-Sustaining Town', Enniskerry, coupled with its strategic location and access to public transport and increasing population, it is respectfully submitted that the town can cater for an increased number of houses than proposed in the Core Strategy. This is a fundamental issue which needs to be addressed with the most up to-date population information available.

6.2 BENEFITS OF THE AREA ACTION PLAN

The application included important local improvements and community gain on a plan-led basis including an enterprise and employment hub, a community building and a Crèche

The previously proposed crèche was located to the rear of the site provided for a minimum 67 children and is such that it could service the entire Action Area Plan 2 area (as defined in the Bray Municipal District Local Area Plan 2018-2024).

The proposed development submitted to WCC in Reg. Ref. 22/794 and Reg. Ref. 22/789. included a Village Green which will incorporate a play area. The Village Green is located centrally in the site, accessible to the proposed units and wider area.



Figure 6.2: Extract from Proposed Site Layout Plan Reg. Ref. 22/794 (MCORM)

A c.508sq.m community building was proposed as part of the development. This is located east of the primary vehicular entrance, adjacent the childcare facility and proximate to the GAA club and school site. The community building contained two large rooms which may facilitate a variety of uses, in addition to a reception, staffroom and ancillary facilities.

The enterprise and employment hub was provided as part of the development in the form of a 1-2 storey building in two blocks. The building is proposed at the main entrance to the development and provides a strong urban edge, with surface car parking contained behind.

The proposal included a café on the north-east corner of the building and will provide an inviting space facing onto the proposed village green providing animation and activity. The building was designed in such a manner to allow flexibility of internal sub-division to cater for a variety of different end users.

Enniskerry is identified as having a lack of employment uses in the settlement hierarchy and therefore the permitted development will deliver such uses, making the village more self-sustaining.

The landscaping masterplan for the site has incorporated a number of different landscaped areas, such as courtyards, play areas, passive open space and active open space. The proposed landscaping significantly enhances the overall quality of the scheme, improving the natural environment and incorporation of the scheme within the wider area.

The proposal represented a significant community gain, to be delivered as part of the proposals, and our client is committed to the delivery of the Action Area and it's associated objectives.

7.0 CONCLUSION

It is considered that the focus for the LAP should be, in the first instance, ensuring the adequate provision of housing delivery in Bray and Enniskerry, in order to cater for anticipated population growth over the next plan period. It has been established in the Goodbody Report in September 2024 that there is an existing a significant shortage of serviced zoned lands in the Eastern and Midlands region, as such existing residentially zoned lands should be retained in the forthcoming Local Area Plan.

Secondly, the Core Strategy should not unduly restrict the delivery of housing in Enniskerry. Housing targets should not be applied as strict caps on housing delivery, instead The Council should provide for development at an appropriate scale and at suitable locations.

Thirdly, residential development at the lands at Parknasilloge can be considered to be Tier 1 lands and have been previously found acceptable in principle by both WCC and ABP. Previous applications have included important community gain through community facilitates and employment uses without requiring largescale infrastructure upgrades. Consolidation of the urban form at this location would avoid leapfrogging of development to other more peripheral areas of the overall settlement.

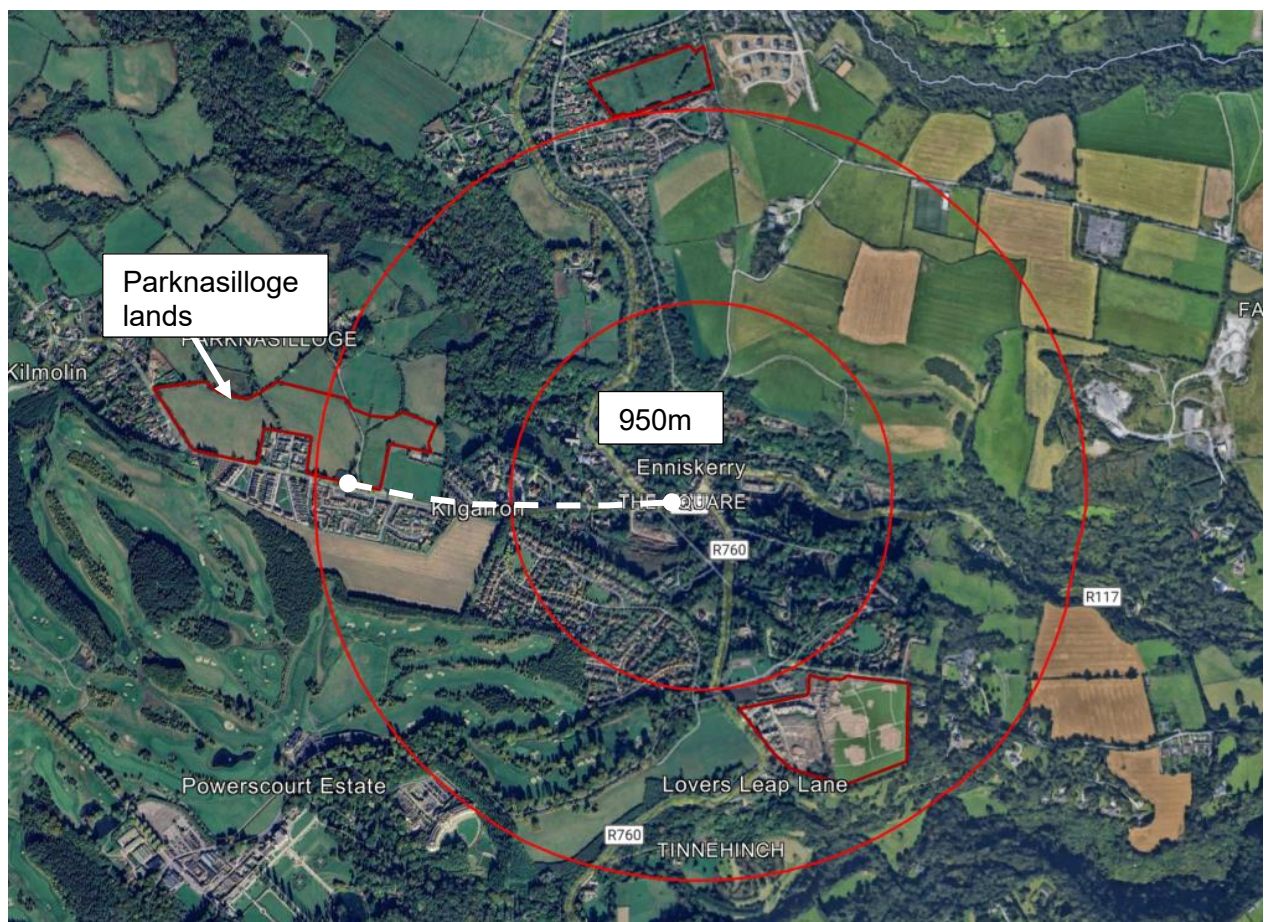
As set out within this submission, the residential land-use zoning objective on our client's lands is entirely appropriate and can be sustainably developed in the short term without significant infrastructure upgrades. As described in this submission the lands at Parknasilloge are Tier 1 lands and the Action Area provisions would deliver important community gain through open space, provision for a school, community facilities and employment uses. The principle of the use has been accepted by both Wicklow County Council and An Bord Pleanála in a number of applications and decisions.

It is respectfully submitted that the draft Bray LAP should incorporate the most recent and up to date information available reflecting the CSO 2022 Census data and Draft Revised NPF and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing in suitable sites, in close proximity to the town centre. This is essential to ensure existing and projected housing need can be met.

APPENDIX 1: TIER 1 SITE

The preparation of the LAP will require an assessment of infrastructure capacity and planning 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, whilst a Sustainable Planning and Infrastructural Assessment (SPIA) should also form part of the LAP to determine the most appropriate residentially zoned sites to deliver housing over the course of the plan period

We set out the suitability of the site for development below and how it meets the Tier 1 definition.



Site	Road Access	Footpaths	Public Lighting	Foul Sewer	Water Supply	Flood Risk	Infill/Brownfield	Comments	Tier
Parknasilloge	Yes	Yes	Yes	Yes	Yes	No	No	Contiguous to the existing built foot print of Enniskerry and less than 1km from the town centre.	1

In terms of available infrastructure for the lands at Parknasilloge, as part of the previous planning application submitted under WCC comprehensive engineering assessment including traffic, water and waste water were prepared by Waterman Moylan Consulting Engineers. In turn this was accepted by WCC.

In relation to traffic the Traffic and Transport Assessment concluded:

This Traffic and Transportation Assessment has confirmed that the proposed access arrangements would adequately accommodate anticipated levels of traffic visitation and that, as such, the traffic generated by the development would have no material adverse impact on the operation of all junctions modelled. It has been shown by the application of recognised assessment techniques that there is a marginal uplift in traffic levels arising from the development and the distribution of resultant flows around the adjacent road network. The results in terms of flows and movements can be accommodated by the neighbouring junctions with delays well within acceptable norms expected at these junctions.

This assessment has also considered the transportation aspects of the internal arrangements of the development and has concluded that the proposals would provide enhanced facilities and improved accessibility for all users of the site.

Accordingly, there are no reasons in relation to traffic and transportation aspects why this scheme should not be granted planning permission.

In relation to water the Engineering Assessment Report stated:

“a statement of design acceptance were obtained from Irish Water based on c. 219 No. units and a creche. Irish Water has issued a Statement of Design Acceptance based on the the previous planning application. In summary, Irish Water has confirmed in the statement that they do not have any objections to the design proposals. It is further noted that since the initial ABP application lodgement in January 2022, the majority of the design remained unchanged.

A Site-Specific Flood Risk Assessment was carried out for this development which concluded that: *“The subject lands have been analysed for risks from flooding from the Irish Sea, fluvial flooding, pluvial flooding, ground water and failures of mechanical systems. Through careful design and appropriate mitigation measures the risks and consequences of flooding have been mitigated across the development.*

Surface water runoff from the site discharges to ground via a series of soakaways and does not impact on developments upstream or downstream of the subject site.

The proposed development is categorised as Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding) as published in Chapter 2, Item 2.23 Flood Zones, of “The Planning System and Flood Risk Management”, “Guidelines for Planning Authorities”, published in November 2009.”

WCC concluded as part of Reg. Ref. 22/794 that:

“Having regard to the location of the development within the development boundary of Enniskerry, on lands zoned for residential development, employment and community within Action Area 2 as set out in the Bray Municipal District Local Area Plan 2018, the design and layout of the development, the Natura Impact Statement, it is considered that, subject to compliance with the conditions set out in the schedule below, the proposed development would comply with the objectives of the Bray Municipal District Local Area Plan 2018 and the County Development Plan 2016, would not seriously injure the amenities of the area, would be acceptable in terms of traffic safety and public health, would not impact negatively on the

Natura 2000 site, therefore, the proposed development would be in compliance with proper planning and sustainable development.”

Under ABP Reg. Ref. 312652 similarly concluded:

“The Board considered that, subject to compliance with the conditions set out below, the proposed development would constitute an acceptable quantum and density of development in this accessible urban location, would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would be acceptable in terms of urban design, height and scale of development, would be acceptable in terms of impacts on traffic and pedestrian safety and convenience, and would provide an acceptable form of residential amenity for future occupants.”

APPENDIX 2: LETTER TO LOCAL AUTHORITY CHIEF EXECUTIVES

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreacht
Department of Housing,
Local Government and Heritage



11 July 2024.

A Chara,

I am writing to you in relation to the ongoing process to revise the National Planning Framework (NPF) and also in relation to the recently published ESRI Report on Population Projections, the Flow of New Households and Structural Housing Demand. We have surpassed our building targets under Housing for All and are now re-doubling our efforts and ambition to increase housing supply. The updated NPF and the ESRI Report form a crucial part of that renewed endeavour.

The draft revised NPF has been approved by Cabinet and will open for public consultation from 10th July until September 12th 2024. The ESRI work on population projections and structural housing demand complements and underpins this work in setting out our housing needs to 2040, and was published on 2nd July. I attach the respective documents for your information.

Having regard to the ESRI forecasts, the NPF sets out that an average of approximately 50,000 new housing units per annum will be needed to meet our needs over the coming years. To achieve that ambition, I am in the process of revising the annual housing targets and breakdown in Housing for All and will finalise that work by October. Building on the considerable progress to date this will involve a further step change in delivery utilising the public and private sector to fund and construct housing.

An important facet of reaching that level of output is ensuring that there is sufficient zoned and serviced land available at suitable locations to facilitate the development of housing and sustainable communities. In the period pending finalisation and approval of the updated NPF, it would be appropriate for each planning authority to undertake a preliminary assessment of the quantum of zoned and serviced land within their administrative area that is available for residential purposes and to estimate the overall housing capacity of such lands.

Where, following this initial assessment, it is considered that there may be a need to increase the amount of zoned and serviced land in order to deliver increased housing supply it would also be appropriate to start considering the most suitable locations for new housing and to commence undertaking the supporting assessments that will be

Oifig an Aire Tithíochta,
Rialtais Áitiúil agus Oidhreacht
Office of the Minister for Housing,
Local Government and Heritage

Teach an Chustaim, Baile Átha Cliath, D01 W6X0
Custom House, Dublin, D01 W6X0
T +353 1 888 2403 | minister@housing.gov.ie
www.housing.gov.ie



required for the process of reviewing statutory development plans to give effect to updated targets.

Any future proposals relating to the zoning of land must be evidenced-based, justified, and consistent with relevant national and regional development policy. In this regard, I would note that the assessments should have regard to the quantum and rate of take-up of zoned and serviced land on the one hand, and suitability on the other, taking account of the settlement hierarchy; servicing requirements and transport accessibility, in particular accessibility to high capacity transport options; environmental considerations and community and sustainable development considerations, of any new lands to be considered. These assessments should also have regard to the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, issued in January 2024, when making density assumptions relating to current and future potential zoned lands.

The formal statutory revisions will be initiated further to the finalisation of the NPF revision process but I believe it would be useful and appropriate to undertake a preliminary assessment in this area. This can then be utilised to move expeditiously within the statutory framework to formally undertake variations to development plans if and where required in the future.

Is mise, le meas,



**Darragh O'Brien, TD,
Minister for Housing, Local Government and Heritage**