



Pre Draft Bray LAP Submission - Report

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Compact Growth - Housing – Population Growth

Submission

On behalf of our client Cairn Homes Properties Ltd., ("Carin Homes") 45 Mespil Road, Dublin 4 D04 W2F1 we wish to make a submission on the pre-draft consultation stage for the new Bray Municipal District Local Area Plan (LAP) "Bray MD LAP" attached.

File

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Submission to the Bray Municipal District Local Area Plan Issues Paper

Prepared for

Cairn Homes Properties Ltd.

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December 2024

EXECUTIVE SUMMARY

On behalf of our client, Cairn Homes Properties Limited (“*Cairn Homes*”), 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 Municipal District Local Area Plan (The Draft LAP).

This submission is focussed on strategic policy and residential zoning strategies, rather than specific sites within the LAP area.

Cairn Homes is seeking to ensure that the Draft LAP does not result in a significant quantum of de-zoning or unnecessary phasing of residential zoned lands contrary to National Planning Policy, the Development Plan Guidelines and Housing for All.

Our client also respectfully considers that the phased approach to ‘*Priority 1*’ and ‘*Priority 2*’ Residential Zonings recently proposed in other LAPs, albeit not formally adopted, in the administrative area of Wicklow has the potential to restrict significantly the delivery of housing and that this approach does not respond to the current housing need and demand or the strategic role of Bray as a Key Town in the MASP.

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 prevailing 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*’.

While we welcome the direction of these updates it is paramount that the Council keep pace with the necessary updates to the Core Strategy and do not unduly restrict the delivery of houses in the area and provide sufficient flexibility to ensure the delivery of new homes over the next LAP period.

In order to avoid transposing lower growth target figures into the Bray MD LAP, we respectfully request that at a minimum all zoned lands within the existing settlement of Bray remain zoned for residential use without any phasing for the next Bray MD LAP.

Set against the backdrop of significant and sustained increases in population, a range of forecasts of higher than anticipated housing demand, as well as the increased annual housing target of 55,000 dwellings in the updated NPF, the publication of the Bray MD LAP Issues Paper provides an important opportunity for the Council to reflect the more up-to-date position of identified population growth and housing needs in 2025 following the publication of the 2022 census data from the Central Statistics Office and the Draft NPF (and associated updated population figures). It is essential that this population growth is reflected in the quantum of zoned residential lands made available to provide for new family homes within the boundaries of the Bray MD LAP lands.

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

REVIEW OF HOUSING NEED ESTIMATES AND POPULATION FORECASTS

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

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

The Housing Commission has estimated that, as of the 2022 Census, there was a housing deficit of between 212,500 and 256,000 homes.

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

Housing Need Demand Assessment Model

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

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

In this regard we note that in the UK the government has launched the NPPF, which looks to reform planning and with the target of building 1.5m homes across the current parliamentary term - with a target to increase the number of homes to 370,000 pa (roughly double the current run-rate). The new UK policy framework sets mandatory housing targets for UK councils with timetables to illustrate delivery of homes.

Our client Cairn Homes Properties Ltd., agree with the Housing Commission's considered view that **“greater costs are associated with underestimating the level of housing required rather than for overestimating it.”** (pg 32 Housing Commission Report - JSA Emphasis added)

One of the most noteworthy outcomes of the HNDA model is the fact that Fingal is estimated to need a total of just 18,560 new units between 2022 and 2040 (apparently not much more than the 15,500 residential units that is the estimated requirement for Co. Donegal). This level of estimated demand belies the fact that Fingal has been one of the fastest-growing local authority areas over the past two decades, has a key role in meeting Dublin's housing needs, has one of the youngest populations in Ireland, has ample land to grow further, and has significant infrastructure in place, including planned projects including Metrolink and DART+. It is important that there is sufficient zoned land for Bray reflects the underestimation of pent up demand within the MASP area and for Bray.

Recent CSO Projections

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 2008.

The CSO (Population and Migration Estimates – August 2023 and 2024) estimates that the population of the State increased by c. 196,300 people (or 3.7%) between April 2022 and April 2024 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. It is acknowledged that a component of this observed growth could be attributed to recent high migration, particularly with regard to Ukrainian refugees, and therefore it is considered reasonable to assume that this will not be sustainable.

Existing unmet Housing Need (Pent-Up Demand)

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 Housing Commission Report sets out the following recommendation (no. 1):

“Recognise and prioritise dealing with Ireland’s housing deficit and address it through emergency action.”

Therefore, it is incumbent on the Planning Authority to not phase or de-zone lands in the Key Town of Bray also within the MASP given the urgent need for new homes as expressed above in the Housing Commission Report. The accelerated delivery identified above by the Housing Commission will not be possible if there is a reduction in zoned land or lands are phased within the Bray LAP area.

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

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

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

Other Estimates of Housing Need

According to the Davy June 2024 Commentary, Ireland needs to build almost 85,000 new homes a year to address the structural shortfall in housing and the expected population growth over the next 10 years. The report notes that the number of housing units per adult at 0.51 (in 2022) is lower than the average of 0.61 units per adult for other European countries and that 85,000 units per annum would be required to reach the midpoint of 0.55 units per adult (by 2030). In this regard it is considered that at least 60,000 dwellings per annum are required to meet demand.

REDUCTIONS IN RESIDENTIAL LAND SUPPLY

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

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

Having regard to the critical need for housing it is recommended that the future LAP for the Key Town of Bray does not reduce the quantum of zoned land or place order of priority of zoned lands so as to render some lands as effectively de-zoned. It is key that there is sufficient flexibility for the Council to meet the challenge of delivering sufficient numbers of dwellings in Bray so that the Council meets its requirements **regarding** the delivery of much-needed housing. We would highlight that the observed low activation rates (20% for County Wicklow as set out in the Goodbody Report) and an even lower activation rate of c. 8% for the town of Bray in the previous LAP period means that any de-zoning or phasing of lands in the future LAP places a significant risk of the Planning Authority's statutory obligations to deliver sufficient dwellings for its administrative area.

HOUSING NEED DEMAND ASSESSMENT MODEL

The Housing Commission Report identifies a crucial lacuna in the implementation of the Housing Need and Demand Assessment (HNDA) framework noting that *"The assessments were designed to give broad, long-run estimates of what future housing need might be, rather than precise estimates."*

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

THE PROVISION OF ZONED LANDS IN THE BRAY MD LAP

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

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

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

It is clear from Table A and a review of Table 3.1 of the Bray MD LAP 2018 as well as the Wicklow County Council Planning Portal, that while there has been some activity and construction of units within the timeframe of the LAP, notably at the following sites SLO1, SLO 3 and SLO9, the percentage

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

of completed units c. 550 unit is approximately 8% of the overall figure of c. 6,500 units identified in the 2018 LAP.

APPROACH TO RESIDENTIAL ‘PRIORITY 1’ & ‘PRIORITY 2’ ZONING

The main aim of any Local Area Plan should be to provide a robust and sustainable framework, so that all parties to the development process can work with, in the interest of delivering much needed housing in tandem with the required social infrastructure for the future of the Key town of Bray. Cairn Homes’ principal concern is that the future LAP for Bray would be that lands are either de-zoned or phased to an extent to result in an effective de-zoning of significant areas of residential lands as a result of using out of dated and inaccurate data.

It is submitted that a too rigid application of Priority 1 to Priority 2 designations could lead to the unintended consequence of serviced lands not being brought forward for development due to unforeseen circumstances on other unrelated sites. In light of this Cairn are seeking a greater flexibility in the application of Priority 1 and Priority 2 designated lands so that there are no conflicts with the over-arching core strategy.

It is respectfully submitted that based on experience, activation rates of zoned land translating into completed housing over a typical 6-year plan period is typically to c. 20% of zoned land (Goodbody 2024) nationally meaning that there may be a 80% shortfall in housing delivery and a consequent lack of housing delivered during the plan period. Therefore, the amount of zoned land needed to deliver on the targets outlined in the LAP needs to take into account the historically low activation rates of zoned land.

It is important that the future Bray MD LAP’s phasing strategy does not ‘bake in’ undue restrictions in brining serviced land for development arising from unforeseen impediments which could rule out significant areas from development and lead to the non-delivery of much needed housing for the Key Town of Bray. The LAP policy to refuse to even ‘consider’ development proposals on Priority 2 lands until the over whelming majority of Priority 1 lands are activated is highly restrictive, onerous, and will lead to the failure to secure the necessary quantum of homes required concerning the extremely low level of land activation/completions as evidenced in the period of the 2018-2024 Bray Municipal District Plan.

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

“ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan.” (emphasis added).

We trust this submission is helpful to the Planning Authority and Cairn look forward to extending their track record of delivering high quality homes in the County within the lifetime of the new LAP for Bray Municipal District and beyond.

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DOCUMENT CONTROL SHEET

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1.0 INTRODUCTION

On behalf of our client Cairn Homes Properties Ltd., (“*Cairn Homes*”) 45 Mespil Road, Dublin 4 D04 W2F1 we wish to make a submission on the pre-draft consultation stage for the new Bray Municipal District Local Area Plan (LAP) “*Bray MD LAP*”.

Cairn is an Irish homebuilder founded in 2014 with a clear strategy to deliver high-quality new homes with an emphasis on design, innovation, and customer service. Following a successful initial public offering (IPO) in June 2015 to raise funds to finance the development of new homes in Ireland, Cairn is actively engaged in the delivery of some 15,000 homes over the coming years and have to date completed 7,474 homes. In 2023, Cairn delivered 1,741 new homes and increase from 1,526 new homes in 2022. To date Cairn have delivered some 1,060 new homes in Wicklow.

In addition, Cairn has been involved in assisting in the delivery of 2 new schools in Wicklow, community and sports facilities and enterprise units. Cairn is committed to working with Wicklow County Council in the delivery of much-needed new homes together with the associated infrastructure necessary to deliver new communities with improved and high-quality amenities.

Cairn Homes welcomes the publication of the Issues Paper for the Bray MD LAP which will inform the future framework for the key town of Bray.

The Planning and Development Act 2024 has been approved by the Oireachtas and signed into law by the President. One of the key changes to be implemented in the new Planning Bill is for longer term, more strategic, ten-year plans for Local Authorities. This means that the WCDP, as adopted, would require to be updated to project population and housing figures for a 10-year period, not the current 6-year period.

2.0 REVIEW OF HOUSING NEED ESTIMATES AND POPULATION FORECASTS

2.1 NATIONAL PLANNING FRAMEWORK DRAFT UPDATE (JULY 2024)

The first Draft Revision of the NPF was published on the 10th of July 2024. Table 10.1 of the Draft Revision indicates that within the first 8 years from the 2022 Census, Ireland’s population is targeted to grow by c. 600,000 people (from 5,149,139 as per the CSO). By 2040, this targeted 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.

The Revised NPF 2024 now plans for a population of 6.1 million by 2040. Under the draft NPF revision projections, the framework estimates some 950,000 additional homes will be required in the State by 2040, at a rate of c. 50,000 homes per annum over the 2022-2040 period:

NPO 32

To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.

From the above, the NPF predicts that an average output of at least 50,000 new homes will need to be completed per annum between 2018 and 2040. In this way, the plan states that this will allow for the delivery of well-located and affordable homes whilst accommodating for the increasing demand for smaller household sizes.

2.1.1 JSA REVIEW OF HOUSING NEED ESTIMATES AND POPULATION FORECASTS

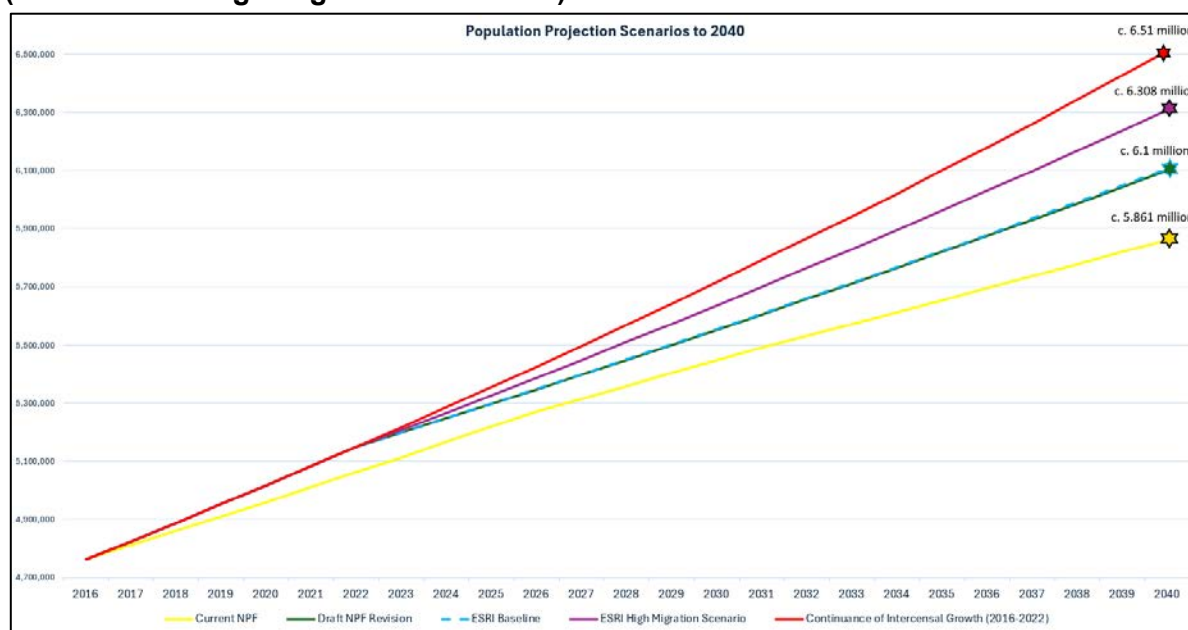
Ireland's population increased by 387,274 (or 1.312% year-on-year) between Census 2016 and Census 2022 – if this growth rate were to continue, it would result in a total national population of c. 6.51 million people by 2040, equating to an increase of 1.36 million people on the 2022 census. This compares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

The projections in the Draft NPF Revision are based on the ESRI's July 2024 publication *'Population projections, The Flow of New Households and Structural Housing Demand'*, which also included a *'High Migration'* projection scenario estimating the national population to grow to c. 6.308 million: an increase of c. 1.158 million people by 2040.

It appears that the draft NPF has placed more weight on the lower migration scenario and that the migration assumptions used by the ESRI are relatively low in a recent historical perspective.

Given the high levels of population growth experienced over an extended 25-year period (from 2001-2024), and the growth experienced over the most recent census period, it is respectfully suggested that the LAP should plan for additional growth over and above currently indicated in the core strategy.

Figure 2.1: Population Projections under the Current NPF, Draft Revision, ESRI (Baseline and High Migration Scenarios) and observed Intercensal Growth Scenario



Source: JSA

It is also highlighted that we consider that the quantum of new residential units is, notwithstanding the uplift from 33,000 pa to 50,000+ pa still would represent a significant shortfall in the required number of dwellings. The following sections outline the wide range of independent sources which identify the shortfall in targets set out in the draft NPF.

2.2 HOUSING COMMISSION REPORT 2024

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

The report outlines that *“A major issue of concern to the Commission is Ireland’s housing deficit. It is critical that this housing deficit is addressed through emergency action. Coupled with this is the need for a step change increase in the level of housing supply on an ongoing basis.”*

The Housing Commission Report (HCR) states that the elimination of the existing housing deficit should be the immediate and essential priority to resolve the current housing crisis and meet Ireland’s housing requirements.

The Housing Commission has estimated that, as of the 2022 Census, there was a housing deficit of between 212,500 and 256,000 homes. Several aspects of the housing system, evident to most observers, suggest a significant existing housing deficit. These include:

- *The low level of housing construction in the decade after 2008;*
- *A largely static household size over the same period;*
- *Low levels of availability of rental and owner occupied housing;*
- *Rates of homelessness.*
- *Low rate of land activation of zoned land due to issues relating to infrastructural constraints, ownership, viability, unwillingness to sell*

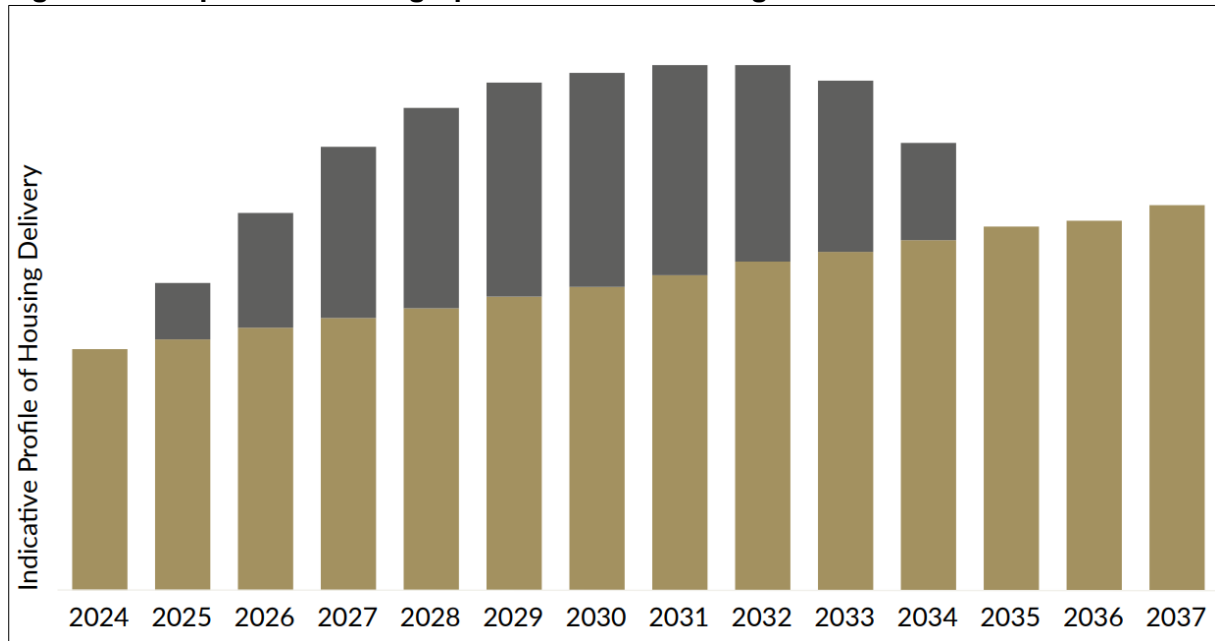
2.2.1 AVERAGE HOUSEHOLD SIZE (AHS)

It is the view of the Housing Commission that the recent stasis in AHS in Ireland is determined by a lack of new homes, with the construction rate at a post-WW2 low during the 2010s.

The HCR sets out that *“as of April 2022, the best estimate of Ireland’s housing deficit was between 212,500 and 256,000 homes. For the remainder of this section, we take the (rounded) mid-point of this range, a deficit of 235,000 dwellings, as the baseline, in instances where a distinction between the housing deficit and future housing requirements is appropriate.*

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

Therefore, it is incumbent on the Planning Authority to not phase or de-zone lands in the Key Town of Bray also within the MASP given the urgent need for new homes as expressed above in the Housing Commission Report. The accelerated delivery identified above by the Housing Commission will not be possible if there is a reduction in zoned land or lands are phased within the Bray LAP area.

Figure 2.2: Representational graph to address housing deficit within a decade

Source: Figure 2.1 Housing Commission Report

Having regard to the above, it is submitted that the new LAP for the key town of Bray should allow for sufficient flexibility in the lands zoning for the settlement and ensure that there is a surplus of zoned land so that the historically low activation rates do not impinge on the delivery of much needed housing.

The following Table presents a summary of the Housing Commission scenarios in terms of population and housing requirements, as assumed and calculated respectively, in comparison to current NPF projections

Figure 2.3: Additional dwellings needed in aggregate 2024–2050, by scenario

Household size 2050	Population in 2050				
	6.25 million	6.50 million	6.75 million	7.00 million	7.25 million
2.4 persons	869,000	977,000	1,084,000	1,191,000	1,298,000
2.3 persons	986,000	1,098,000	1,210,000	1,322,000	1,433,000
2.2 persons	1,113,000	1,230,000	1,347,000	1,464,000	1,581,000
2.1 persons	1,252,000	1,375,000	1,497,000	1,620,000	1,742,000
2.0 persons	1,405,000	1,534,000	1,663,000	1,791,000	1,920,000
1.9 persons	1,575,000	1,710,000	1,846,000	1,981,000	2,116,000

Source: Table 2.1 Housing Commission Report, assuming 0.5% obsolescence, including any housing deficit

Figure 2.4: Average annual housing requirements 2024–2050 under alternative scenarios,

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: Table 2.2 Housing Commission Report assuming 0.5% obsolescence, including any housing deficit

The Housing Commission Report outlines that in addition to city and regional population distributions, *“a range of demographic, economic, cultural and social dynamics are creating demand for smaller homes, in urban areas in particular. The percentage of the population in pre-family formation age groups will continue to grow in importance, but the social progression of this cohort is currently being constrained by a lack of suitable housing.”*

2.2.2 HOUSING NEED DEMAND ASSESSMENT MODEL

The Housing Commission Report identifies a crucial lacuna in the implementation of the Housing Need and Demand Assessment (HNDA) framework noting that *“The assessments were designed to give broad, long-run estimates of what future housing need might be, rather than precise estimates.”* (JSA Emphasis)

The report notes that *‘housing demand is expected to be larger than new household formation in the short term to deal with the deficit that has built up since 2010’*. However, housing supply deficit estimates were not provided in the report, and a deficit figure is not factored into the annualised housing demand estimates. ***The Commission is of the view that this approach has resulted in an understatement of the true level of housing required.*** Most importantly, for this to be addressed as set out previously, there is a need to fully account for the housing supply deficit.” (JSA Emphasis)

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

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

The HCR identifies a crucial point stating:

*“Too often analysis and projections of housing requirements are carried out based on making housing requirements equate to housing supply targets. To take account of the fact of uncertainty about future events, projections for the level of housing required should be expressed as ranges rather than exact values. This uncertainty has policy implications, in that **greater costs are associated with underestimating the level of housing required rather than for overestimating it.**”* (JSA Emphasis)

It is submitted that a key failing of HNDA model is that it does not take into account unmet demand from under-construction and rates of homelessness, as well as the pent up demand which have been evident for over a decade. The HNDA model focuses on population and housing need projections and, as a result, it further underestimates the true level of housing demand. The Housing Commission identified the application of the HNDA model as a constraint to the delivery of dwellings.

One of the most striking outcomes of the HNDA model is the fact that Fingal is estimated to need a total of just 18,560 new units between 2022 and 2040 (apparently not much more than the 15,500 residential units that is the estimated requirement for Co. Donegal). This level of estimated demand belies the fact that Fingal has been one of the fastest-growing local authority areas over the past two decades, has a key role in meeting Dublin’s housing needs,

has one of the youngest populations in Ireland, has ample land to grow further, and has significant infrastructure in place, including planned projects including Metrolink and DART+.²

2.3 CORE STRATEGY AND SERVICED LAND

The Housing Commission's Report provides important 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."*

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.

In our view this should include ensuring local authorities are not unduly restricted by the Core Strategy and allowing them to zone the appropriate quantum of residential land.

2.4 ESRI 'POPULATION PROJECTIONS, THE FLOW OF NEW HOUSEHOLDS AND STRUCTURAL HOUSING DEMAND' (2024)

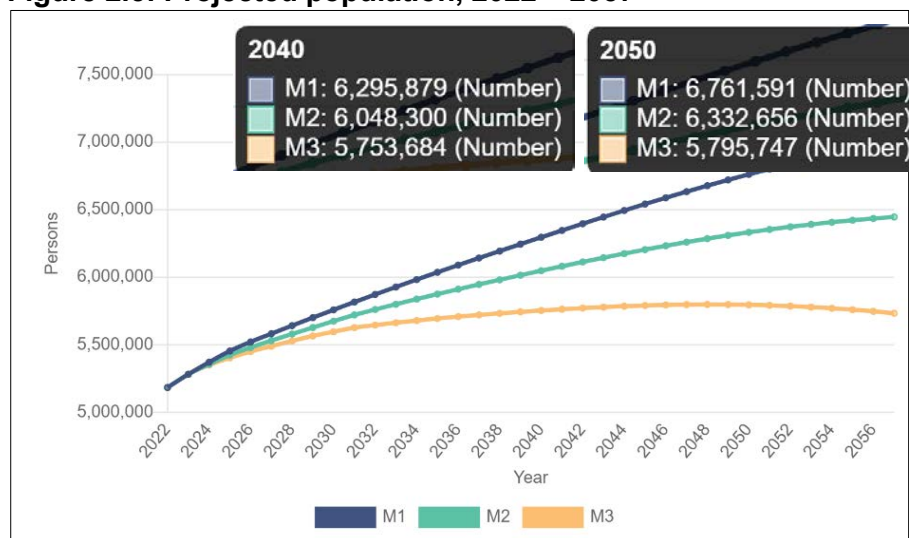
The ESRI report, published in 2024, provides estimates of structural (demographic) housing demand at a regional level. Any assessment of structural future housing demand relies on assumptions around (1) population growth, (2) headship rates (the typical household size) and (3) rates of obsolescence of the housing stock. The ESRI report outlines that Ireland has experienced rapid population growth in recent years, both compared to historical experience and relative to the EU. Census 2022 data reveals that the population was 5.184 million, having increased by 422,000 or by 9 per cent since 2016. This rate of growth is comparable to the long-run population growth over the past 25 years.

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."*

2.5 CSO POPULATION AND LABOUR FORCE PROJECTIONS 2023-2057

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

² [AIB-real-estate-housing-market-report.pdf](#)

Figure 2.5: Projected population, 2022 – 2057

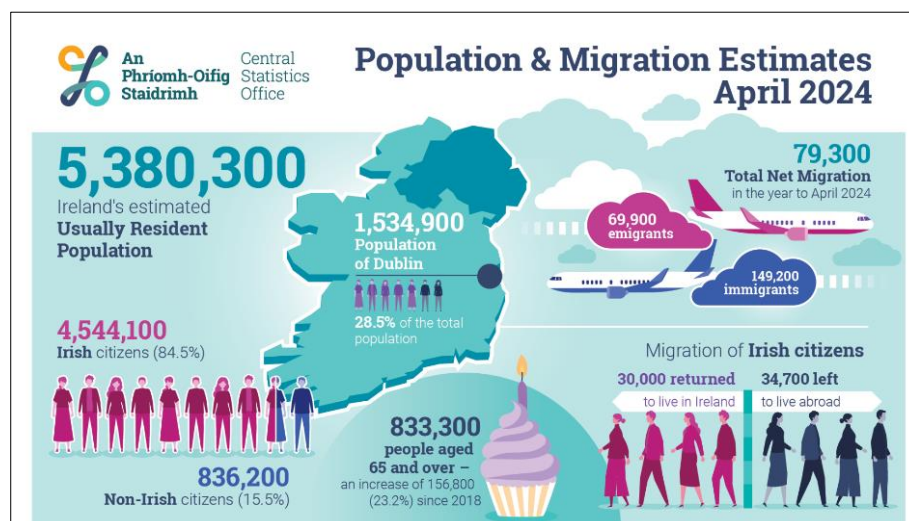
Source: Figure 2.1 CSO Projected population, 2023 – 2057

2.6 POPULATION AND MIGRATION ESTIMATES, APRIL 2024

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 2008.

The number of immigrants, or those entering the State, in the year to April 2024 was estimated to be 149,200, while the number of emigrants, or those leaving the State, over the same period was estimated at 69,900. These combined flows gave positive net migration (more people having arrived than left), of 79,300 in the year to April 2024, compared with 77,600 in the previous year.

For the past 3 years the population has increased by 77,800 to April 2022, 97,600 to April 2023 and 98,700 to April 2024.



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.

2.7 DAVY IRISH ECONOMIC COMMENTARY (JUNE 2024)

According to the Davy June 2024 Commentary, Ireland needs to build almost 85,000 new homes a year to address the structural shortfall in housing and the expected population growth over the next 10 years. Davy said it expected the Republic's population to grow to 5.9 million by 2030, which would be 524,000, or 10 per cent, ahead of the Government's National Planning Framework (NPF) baseline of 5.36 million, noting *"This forecast has significant implications for housing demand over the coming years,"*

Davy estimates that:

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

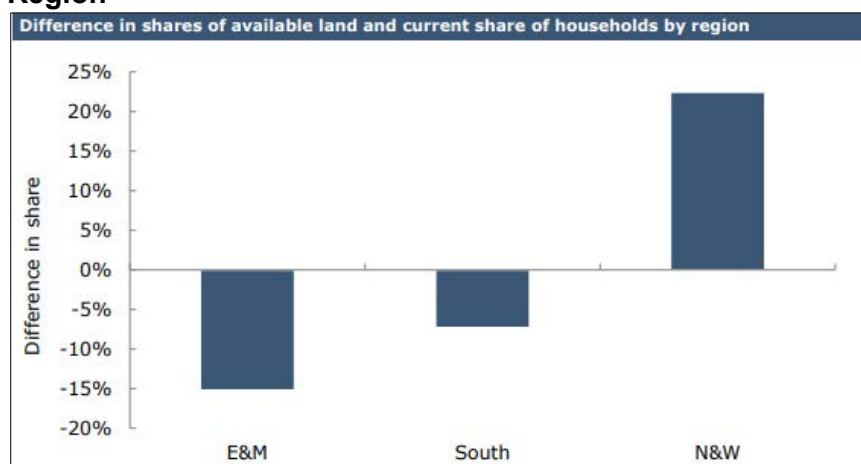
Davy expects 36,000 housing completions this year and 42,000 in 2025, building on increased delivery in 2023 and aided by the waiver of development levies and refunds for water connection charges. Furthermore, the Davy report outlines that:

"Reaching 0.55 housing units per adult by 2030 in this scenario – the midpoint between Ireland (0.51) and the 0.61 average for western Europe – would require an output of 85,000 homes a year. Closing the gap completely by 2030 would require a housing stock of 3.02m dwellings – requiring an average of around 122,000 new homes annually."

3.0 REDUCTIONS IN RESIDENTIAL LAND SUPPLY/ZONED LAND

Goodbody³ outlines that there is insufficient zoned serviced land in the eastern and midlands and southern regions to meet updated housing supply targets over six years. In addition, Goodbody estimates that there is a need for as many as 60,000 units a year over this period to deal with an existing shortfall of supply as well as forecast population growth.

Figure 3.1: Difference in Shares of Available Land and Current Share of Households by Region



Source: Goodbody 2024

³ [goodbody_residential-land-availability-report_sept24.pdf](#)

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

Goodbody⁴ outlines that there is insufficient zoned serviced land in the eastern and midlands and southern regions to meet updated housing supply targets over six years. In addition, Goodbody estimates that there is a need for as many as 60,000 units a year over this period to deal with an existing shortfall of supply as well as forecast population growth.

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

3.1.1 CHANGE IN HOUSING YIELD OF ZONED LAND

Goodbody have also 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 and associated LAP, as any new development needs zoned and serviced land before it can begin.

The Goodbody baseline estimate is that there is land sufficient to supply 417,000 units across Ireland. However, 138,000 (33%) of these are in eastern and midlands region, 110,000 (26%) are in the southern region, and 168,000 (40%) are in the northern and western region. The location of this land is not aligned with the regional targets of the NPF or the current regional distribution of households in Ireland. While the northern and western regions account for 40% of zoned land, this only accounts for 18% of households in the State.

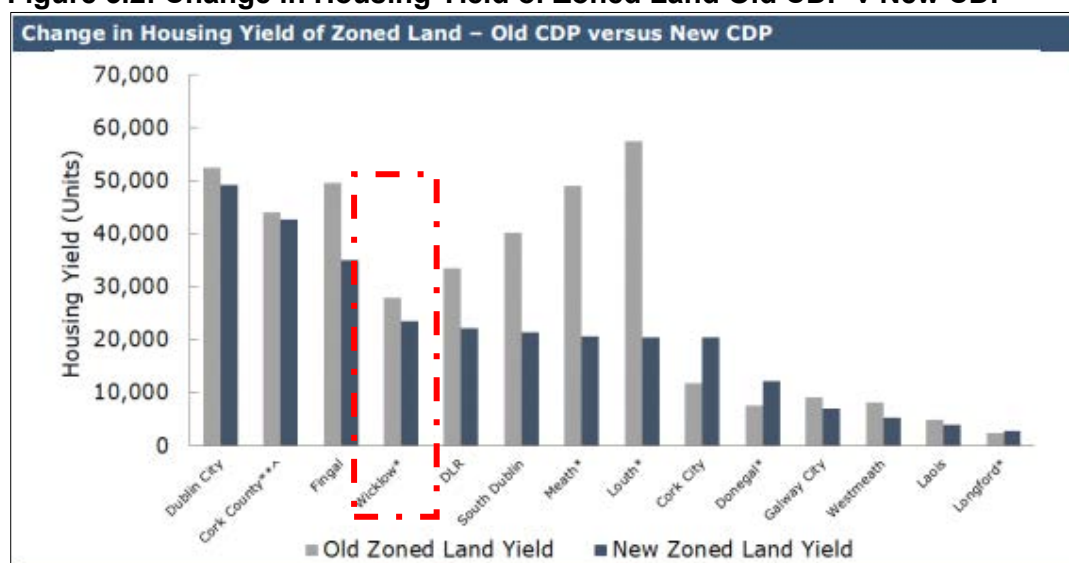
The Goodbody report outlines that it is critical that there is enough zoned serviced land if the nation's housing needs are to be met.

Critically the Goodbody 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.”*** (JSA Emphasis)

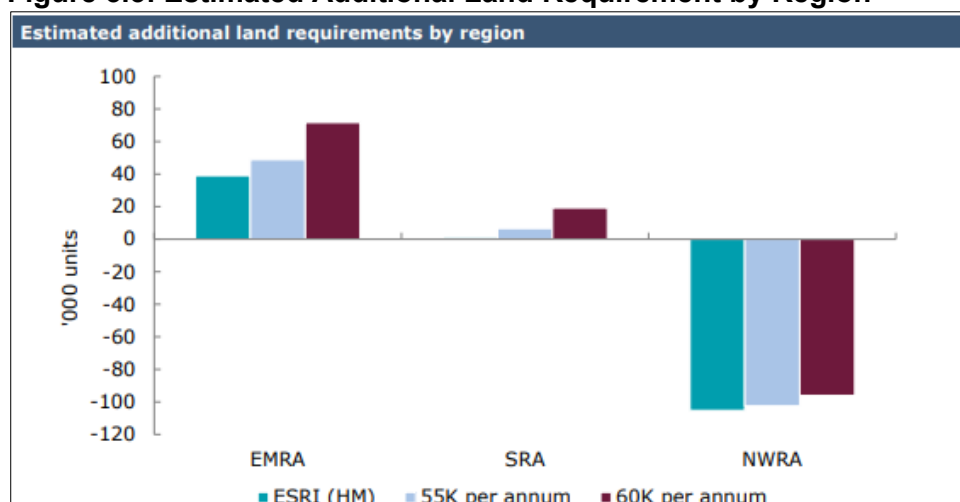
Furthermore, the Goodbody report identifies that the EMRA region once again has a very significant role in the reduction in zoned lands nationally stating that *“This restricted EMRA sample (which excludes Offaly and Kildare) saw a reduction in the housing yield of zoned land of 37.2%, equating to a 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.”*

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.

⁴ [goodbody_residential-land-availability-report_sept24.pdf](#)

Figure 3.2: Change in Housing Yield of Zoned Land Old CDP v New CDP

Source: Goodbody 2024

Figure 3.3: Estimated Additional Land Requirement by Region

Source: Goodbody 2024

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

It should be noted however, that this report somewhat underestimates the amount of zoned land required, in that it includes a highly conservative “buffer” figure of 40% minimum. This is calculated simply on the basis of allowing for the proportion of land where planning permission has been refused or quashed on JR, and, where permissions have been granted, and, for a range of reasons, the permission has not been or is not capable of implementation.

In these instances, the owner/developer will be aware of these constraints prior to making a planning application, and indeed may well have been informed by the planning authority in the pre-application process, that any planning application would be refused due to the constraints applying to the site, such as infrastructure, or for phasing restrictions or other reasons beyond the applicant's control.

Therefore, a significant portion of the land simply does not come forward for a planning application during the lifetime of the Plan and this figure needs to also be assessed and added to the 40% “buffer”, or “headroom” arising from the planning permissions for which applications have not been successful or are not capable of implementation.

This figure of 40% however, does not account for the significant proportion of zoned land for which a planning application has not been made within the lifetime of a Development Plan. There are a range of reasons why a significant proportion of zoned is not brought forward to planning application stage. The most common reason is infrastructure constraints, particularly in relation to access or other transport constraints and services such as water and drainage. Other reasons include phasing within statutory plans or within non-statutory masterplans, or other non-statutory documents prepared by the planning authority; title constraints, viability issues due to site conditions, environmental impediments, and unwillingness of landowners to dispose.

3.2 RESIDENTIAL LAND SUPPLY STUDY (2022) - REDUCTION IN ZONED LAND⁵

Savills (2022) published a report in relation to residential land supply which outlines that “*by comparing the land available for new housing delivery between current and previous county development plans, within the GDA, we can see **that there has been a reduction in land available for development to the tune of over 100,000 units.***”

This estimate was calculated by comparing current with previous county development plans to the existing Development Plans. The timing of the decrease in the supply of residentially zoned land available for residential development has the effect of discouraging investment in residential land due to the risk of dezoning and also serves to increase the value in existing zoned land which is a cost which is ultimately passed on by a developer and borne by the purchaser of a dwelling.

The focus should be on ensuring that minimum targets are met rather than maxima exceeded. We need a floor rather than a ceiling for housing delivery.

Figure 3.4: Estimate of Reduction in Zoned Land in GDA

County Council	Estimated reduction in units
Meath	28,400
Kildare	21,600
South Dublin	17,400
Wicklow	16,800
Fingal	15,400
Dún Laoghaire-Rathdown	10,100
Dublin City	3,300
Total	113,000

Source: Savills The Residential Land Supply Study (2022)

⁵ [residential-land-supply-study.pdf \(savills.co.uk\)](https://www.savills.co.uk/residential-land-supply-study.pdf)

Knight Frank (2024) highlight *that the supply of residential zoned land has become an increasingly acute problem in the market. However, both the volume of sites that will be made available to the market and the scale and type of product that the land is zoned for is not expected to be enough to meet the overall demand requirements in the market.*⁶

4.0 DEVELOPMENT PLAN GUIDELINES 2022

The Development Plan Guidelines 2022 (DPGs) were published in July 2022. Section 4.3 of the DPGs recognise the difficulty in managing medium and long-term planning and incorporating population targets into the 6-year statutory development plan cycle.

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

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.”*

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

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

5.0 KEY POINTS OF SUBMISSION

5.1 CORE STRATEGY AND ACTIVATION/COMPLETION RATES – 2018-2024 BRAY

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

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

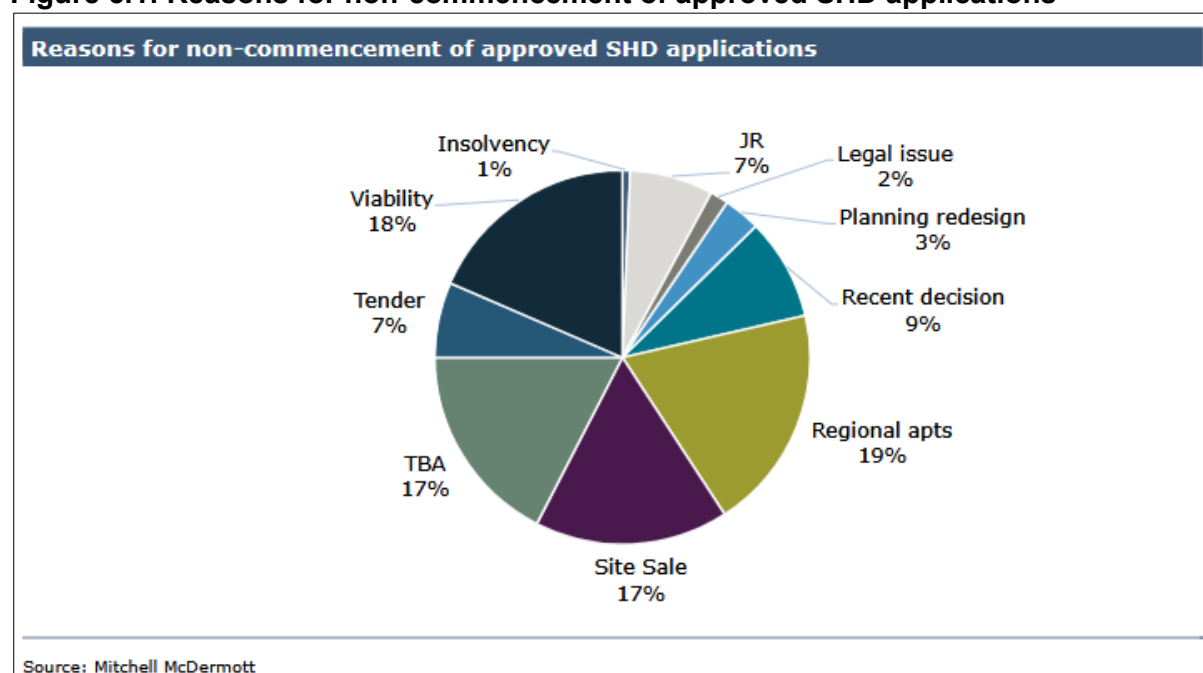
We refer the Planning Authority to the recent report by Goodbody research which demonstrates that actual activation and housing completion rates are far below 75% of all zoned land in a 6-year period. It is noted that Wicklow County Council secured only 20% activation of zoned land over the last CDP period 2016-2022. Therefore, the CDP clearly does

⁶ [KF-Ireland-living-sectors_April-8-2024_FINAL-for-web.pdf \(knightfrank.ie\)](#)

not meet this key requirement to ensure that the CDP core strategy has made adequate provision for zoned and serviced sites that will come forward during the lifetime of the plan.

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.

Figure 5.1: Reasons for non-commencement of approved SHD applications



(Source: Goodbody Residential land availability, 2024)

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

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

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

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

Having regard to the observed activation rate for the Key Town of Bray, it is respectfully submitted that there is no rezoning or phasing of zoned land within the LAP boundary.

5.2 APPROACH TO RESIDENTIAL 'PRIORITY 1', 'PRIORITY 2' ZONING/PHASING – UNINTENDED CONSEQUENCES

It is noted that recent Local Area Plans in Wicklow have recently incorporated a Priority zoning approach and designating lands New Residential Priority 1 lands or New Residential Priority 2 lands.

For example, the recently published Draft Wicklow Rathnew LAP notes that *"The lands that are needed to be zoned to meet the current target will be zoned 'New Residential' and identified in this plan as 'New Residential Priority 1' lands."*

In order to ensure an adequate future supply of housing lands, should the need arise for their development having regard to any changes to housing targets that might arise during the lifetime of this LAP, additional lands shall be zoned - 'New Residential' and identified as 'New Residential Priority 2' which shall only be considered for consent where it can be shown that such development would accord with the Core Strategy targets after the activation of Priority 1 lands."

While it is acknowledged that the wording does allow for some flexibility stating that, *"having regard to any changes to housing targets that might arise during the lifetime of this LAP"*, it is respectfully submitted that based on experience, activation rates of zoned land translating into completed housing over a typical 6-year plan period is typically to c. 20% of zoned land (as per Goodbody Report) nationally meaning that there may be a c. 80% shortfall in housing delivery and a consequent lack of housing delivered during the plan period. Therefore, the amount of zoned land needed to deliver on the targets outlined in the LAP needs to take into account the historically low activation rates of zoned land.

It is submitted that a too rigid application of Priority 1 to Priority 2 designations could lead to the unintended consequence of serviced lands not being brought forward for development due to unforeseen circumstances on other unrelated sites. In light of this Cairn are seeking a greater flexibility in the application of Priority 1 and Priority 2 designated lands so that there are no conflicts with the over-arching core strategy.

It is important that the future Bray MD LAP's phasing strategy does not *'bake in'* undue restrictions in bringing serviced land for development arising from unforeseen impediments which could rule out significant areas from development and lead to the non-delivery of much needed housing for the Key Town of Bray, located within the MASP as set out in the RSES with excellent accessibility to modes of public transport. The LAP policy to refuse to even *'consider'* development proposals on Priority 2 lands until the overwhelming majority of Priority 1 lands are activated is highly restrictive, onerous, and will lead to the failure to secure the necessary quantum of homes required concerning the extremely low level of land activation/completions as evidenced in the period of the 2018-2024 Bray Municipal District Plan.

We would highlight that Policy WTR4 of the Draft Wicklow Rathnew LAP states:

WTR4 Notwithstanding the zoning / designation of land for new residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);

- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.

It is respectfully submitted that the entire strategy for the future development of much needed housing should not be dependent on reaching too high a threshold. In this regard we would recommend that, if in the event the concept of Priority 1/Priority 2 zoning is included in the Bray MD LAP that the threshold is reduced to 50%. The proposed reduction from 75% to 50% of zoned lands goes some way to reflecting historic rates of land activation and creates a more robust scenario for the housing needs of Bray to be achieved.

Furthermore, it is submitted that even in the event of a series of applications being granted within the LAP area, the ability of some developers to access finance and mobilise detailed design and construction teams can be significantly delayed.

Therefore, we would urge caution in the wording of any policy or objective which would be dependent on unrelated sites coming forward for development. It may also result in some sites being delayed indefinitely resulting in the non- delivery of much needed housing for Bray.

The main aim of any Local Area Plan should be to provide a robust and sustainable framework, so that all parties to the development process can work with, in the interest of delivering much needed housing in tandem with the required social infrastructure for the future of the Key town of Bray. Cairn Homes' principal concern is that the future LAP for Bray would be that lands are either dezoned or phased to an extent to result in an effective de-zoning of significant areas of residential lands as a result of using out of dated and inaccurate data.

The Council's Core Strategy and the ensuing expiration of several LAPs has had a significant and detrimental impact on the delivery of housing in the County, resulting in the effective de-zoning of the majority of housing development land in the county and directly responsible for the refusal of permission for Large Scale Developments in Blessington, Greystones and Rathnew equating to over 1,000 homes.

5.3 HOUSEHOLD SIZE AND THE LAP

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

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

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

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

Having regard to the above, it is recommended that the LAP takes into account lower household figures (2.3) in calculating the number of units for Bray.

6.0 CONCLUSIONS

It is considered that the focus for the LAP should be, in the first instance, ensuring the adequate provision of housing delivery in the Key Town of Bray, in order to cater for anticipated population growth over the next plan period. There is an existing a significant shortage of serviced zoned lands in the region, as such there should be no removal or re-phasing of residentially zoned lands in the forthcoming Local Area Plan.

Secondly, the Core Strategy should not unduly restrict the delivery of housing in the LAP area. Housing targets should not be applied as strict caps on housing delivery. Instead, the Council should encourage development at an appropriate scale and at suitable locations.

It is respectfully submitted that the draft Bray LAP must incorporate the most recent and up to date information available in the form of the CSO 2022 Census data and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing in suitable sites, in close proximity to the town centre. The failure of the draft-LAP to address this matter will exasperate the shortfall of housing already being experienced in the area.