



# Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Glenveagh Homes Ltd
Reference:	DWTRLAP-112102
Submission Made	November 20, 2024 11:23 AM

## Topic

Overall Vision and Strategy of LAP

## Submission

On behalf of our client Glenveagh Homes Ltd. Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co Kildare we wish to make a submission on the Draft Wicklow-Rathnew Local Area Plan 2025

## File

Glenveagh Submission to Draft Wicklow Rathnew LAP\_FINAL.pdf, 2.55MB

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

Date: 20<sup>th</sup> November 2024

Our Ref: RK 24303

Dear Sir/Madam,

**RE: FORMAL WRITTEN SUBMISSION – DRAFT – WICKLOW-RATHNEW LOCAL AREA PLAN 2025**

On behalf of our client Glenveagh Homes Ltd. Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co Kildare we wish to make a submission on the Draft Wicklow-Rathnew Local Area Plan 2025 (the “*Draft LAP*”).

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

Glenveagh Homes are active within the LAP boundary: currently constructing a residential development as well as a creche and the first element of what ultimately could comprise a link road between Broomhall Crescent and the Rocky Road.

Glenveagh Homes welcome the publication of the Draft LAP 2025 and support the need for a new local area plan to guide the future development of Wicklow-Rathnew.

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

To further support these key objectives, the following revisions are respectfully requested in relation to the Glenveagh lands. It is considered that the requested amendments to the Draft Plan will support the practical implementation and achievement of the strategies contained within the vision and objectives for the LAP.

## SUMMARY OF KEY RECOMMENDATIONS AND PRINCIPAL POINTS OF SUBMISSION

Glenveagh Homes Ltd., welcome the preparation of the draft Wicklow-Rathnew Local Area Plan 2025. This is an important policy document for the future development of Wicklow-Rathnew which is a Key Town in the RSES for the EMRA.

The focus for the LAP, should in the first instance be on the sequential development of Wicklow town from east to west, in proximity to existing schools and services.

### **Strategic Commentary on Draft LAP**

The household target of 1,619 households should be revised upwards to account for the existing pent-up demand, artificially greater household sizes and increased population growth.

**Plan for Higher Population Growth:** prudent to plan for an evidence based higher population target so as to not unintentionally restrict or cap the supply of critical homes through the under provision of zoned lands which are serviced lands capable of delivering homes.

**Pent-up demand:** The Housing Commission estimates “pent up” demand of between 212,500 and 256,000 with a 235,000 midpoint for the Country. It is important that the final LAP takes cognisance of the recent under-provision of zoned land and include suitably serviced ‘tier 1’ lands such as our clients’ identified in map 1 (submission includes a concept diagram on map 2) which can contribute to the future much needed housing requirements.

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

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

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

**Population Projections – Minimum Targets:** The final LAP should explicitly state that the population projections are not a cap. Demographic projection not translating into caps should become policy and core strategies should not be treated as caps in the interim as existing development plans underestimate population growth and housing need.

### **Commentary in respect of Land Use Zoning**

Our client is seeking that the zoning of the lands identified (c.15.7 hectares) on map 1 are amended to RN1 to allow for sufficient flexibility in the quantum of zoned land which is sequentially located to existing development and existing services. A concept diagram (map 1) is included.

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

The lands identified in this submission to east of the current footprint of Wicklow are an appropriate location/focus for consolidation of Wicklow, particularly as they were zoned previously under the older land use plans for the area and had a previous extant permission for some 481 no. dwellings. Consolidation of the urban form at this location would avoid leapfrogging of development to other more peripheral areas of the overall settlement, avoiding unnecessary longer trips to the centre of Wicklow town with its higher level of services and amenities (compared to Rathnew village centre)

The lands are located close to existing primary and secondary schools as well as local convenience shopping (c. 600m) and c. 1.5km from the monument in the town centre. In addition, there is a permitted creche as part of the under construction development by Glenveagh adjacent to the lands to the north and there are existing schools (primary and secondary) located within 500m of the subject lands.

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

We recommend that the zoning of the lands to residential will result in the effective use of existing infrastructure on serviced land in accordance with the proper planning and sustainable development of the area.

The key town of Wicklow-Rathnew has existing serviced lands which could be brought forward to ensure that sufficient land is zoned and capable of being delivered within the timeframe of the CDP and Core Strategy.

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

Given the 'Key Town' designation of Wicklow-Rathnew, coupled with its strategic location and access to public transport and the documented increased population growth experienced from 2011 until the present day, it is respectfully submitted that the town can cater for an increased number of houses than proposed in the Core Strategy and the Draft LAP. This is a fundamental issue which needs to be addressed with the most up to date population information available.

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

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 zoned land which are already serviced lands capable of delivering homes, such as our clients' lands identified in this submission.

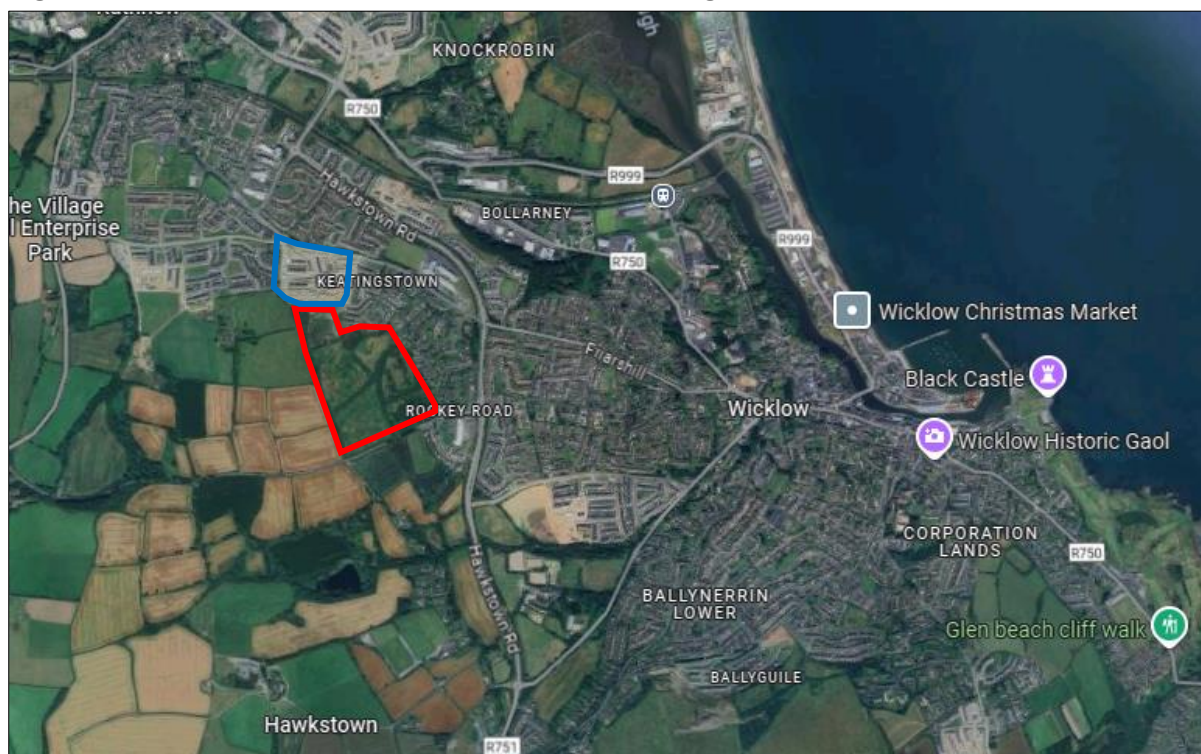
The final LAP should plan for the scenario of maximum growth particularly on tier 1 lands where there is the infrastructure in place to cater for foreseeable demand. Even if this growth fails to occur within the short term, it will materialise in the medium term. The lands identified in this submission are well placed to provide much needed dwellings. Glenveagh have a proven track record in delivering new high quality dwellings.

A range of local facilities including a Centra, pharmacy and hot food takeaway are located north west of the Broomhall roundabout adjacent to existing residential development and approximately 600m north west of the subject land's boundary. Educate Together Wicklow National School abuts the site across Rockey Road immediately to the south east and Colaiste Chill Mhantain located on Broomhall Court within short walking distance to the north. Rathnew AFC and GAA clubs are located further west, accessed by Seaview Heights. Broomhall Business Park lies beyond this area to the north. The site is therefore ideally placed to benefit from a range of facilities and services accessible to the subject lands.

## 1.0 SITE LOCATION AND DESCRIPTION

The subject lands of some 17.6 hectares are situated within immediately adjacent to the existing built-up area of Wicklow. The greenfield site is located in the townland of Ballynerrin, at the western edge of Wicklow town immediately adjacent to the existing built area of Carraigbawn, Keatingstown, and the Friary residential area.

**Figure 1.1: Site Location & Client Ownership (Google Maps)**



The lands are located c. 1.5 km from Wicklow town centre (via the Rockey Road) to the east and are located c.1 km to the east of the M11. The site is bounded by Rockey Road to the south lands under construction to the north (which includes a link road access to the site) and agricultural lands to the west. Agricultural access is currently provided from the Rockey Road.

The subject site location is noted in red within Figure 1, below, with the area outlined in blue under ownership of the applicant. It is proposed that the new link road will form the western perimeter of the site, linking Rockey Road in the south with the existing roundabout at Broomhall Court, which bounds the parcel of land under ownership of the applicant to the north.

The site is notably accessible to both Wicklow town centre to the east and the M11 to the west. The area is well connected by local bus and train links, with Wicklow train station located approximately 1km north east. Cycling lanes are in place along Harmonstown Road, a short distance to the east of the site, accessed by Broomhall Court and Rockey Road respectively.

A range of local facilities including a Centra, pharmacy and hot food takeaway are located north west of the Broomhall roundabout adjacent to existing residential development and approximately 500m north west of the subject lands boundary. Educate Together Wicklow National School abuts the site across Rockey Road immediately to the south east and Colaiste Chill Mhantain located on Broomhall Court within short walking distance to the north. Rathnew AFC and GAA clubs are located further west, accessed by Seaview Heights. Broomhall Business Park lies beyond this area to the north. The site is therefore ideally placed to benefit from a range of facilities and services accessible to the subject lands.

## **2.0 PLANNING HISTORY**

### **Subject Lands Planning Reg. Ref: 066726**

Permission was granted to Chieftain Construction Ltd by for a period of 10 years as per Section 41 of the Planning & Development Act. Permission expired on 29th April 2019. A Final Grant of Permission was issued for 481 residential units, a creche and neighbourhood centre comprising 250 sq.m retail and 250 sq.m office provision on 30th April 2009 by Wicklow County Council subject to 48 no. conditions.

Considering the previously planning permission and its previous zoning for residential use on the subject lands, the principle of residential development is observed as being fully established at the location having been deemed acceptable to Wicklow County Council on extended basis over a number of years. It is therefore considered that the zoning of the lands for residential land use is in accordance with the sequential and proper planning and sustainable development of the area.

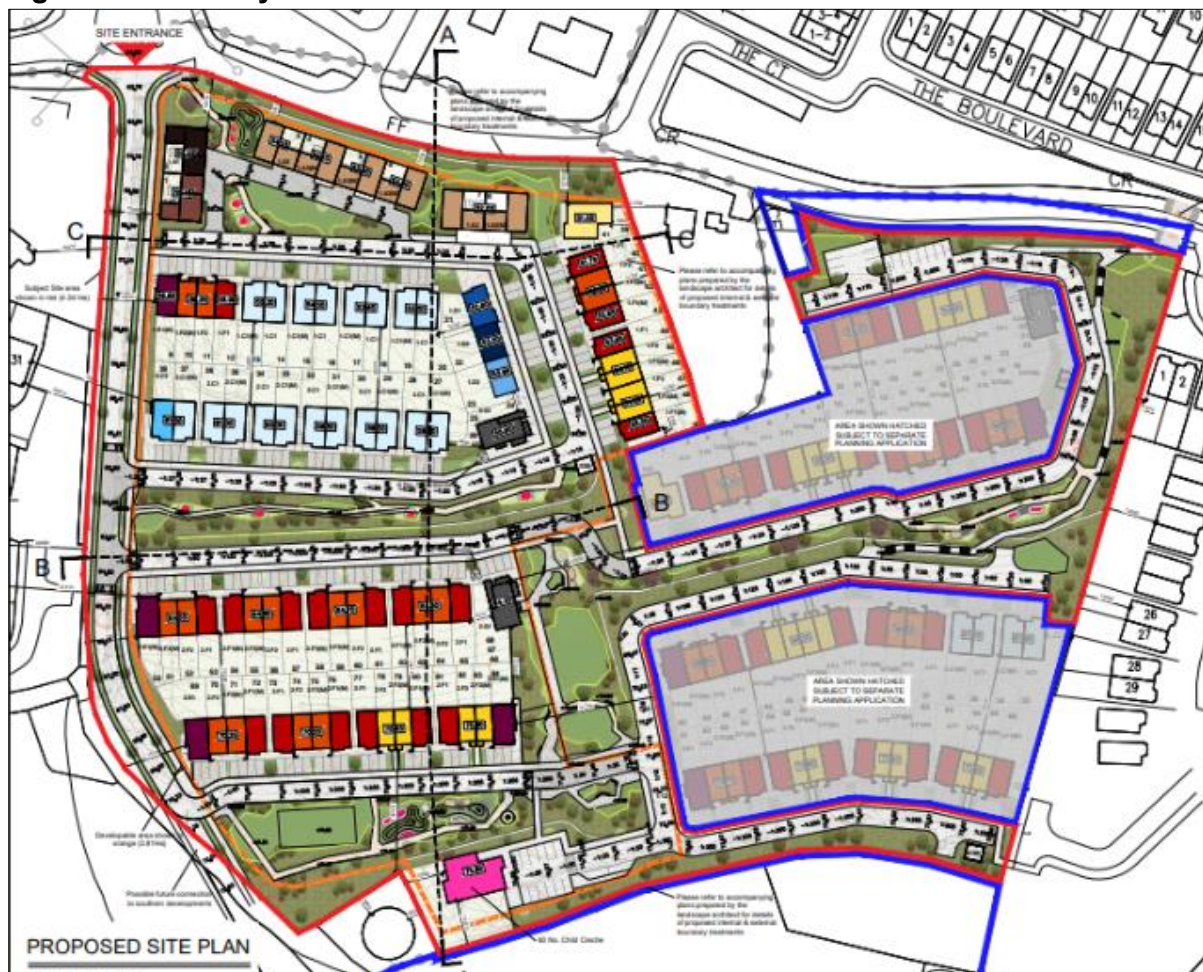
**Figure 2.1: Site Masterplan****Lands to the North Planning Reg. Ref. 21/1119 An Bord Pleanála Ref: 312889/22**

On the 8<sup>th</sup> of May 2023 An Bord Pleanála upheld Wicklow County Council's decision and granted permission to Glenveagh Homes Ltd., for the construction of 84 no. dwellings and a creche as part of a 2 phase development. This site is currently under construction.

The Board in their reasons and considerations stated:

*"Having regard to the provisions of the Wicklow - Rathnew Town Development Plan 2013, the Wicklow County Development Plan 2022-2028, the residential zoning objective for the site, the location of the site within a designated settlement boundary, and the nature, scale and layout of the proposed development, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the visual or residential amenities of the area, or the amenities of property in the vicinity, would not endanger public safety by reason of traffic hazard, and would provide an acceptable standard of amenity for future residents. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area."*

**Figure 2.2: Site Layout Phase 1**



Source: DGA

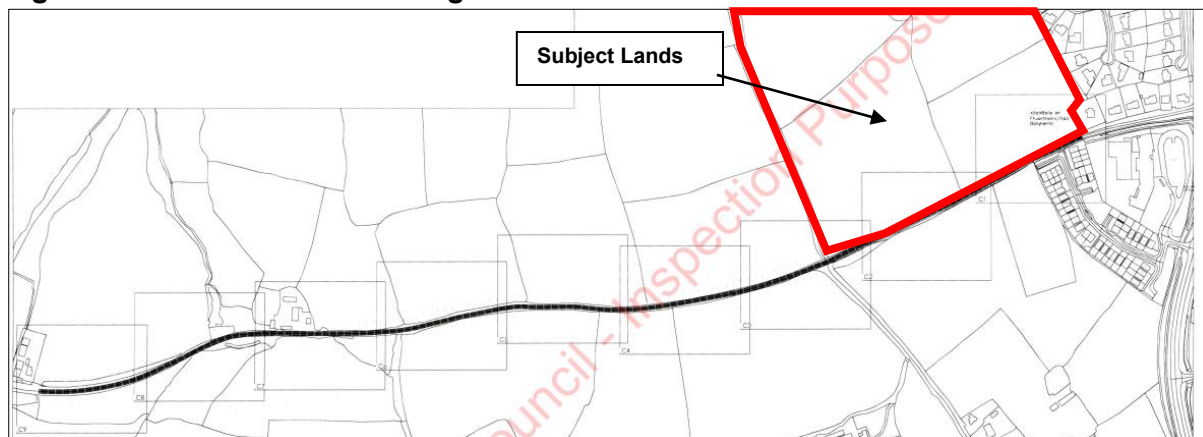
**Planning Reg. Ref. 211187 An Bord Pleanála Ref ,312888-22**

On the 8<sup>th</sup> of May 2023 An Bord Pleanála upheld Wicklow County Council’s decision granted permission for the development of 66 no. dwellings to Glenveagh Homes Ltd., as part of a 2 phase development. This site is currently under construction.

**Planning Reg. Ref. 24365 Lands to southern boundary**

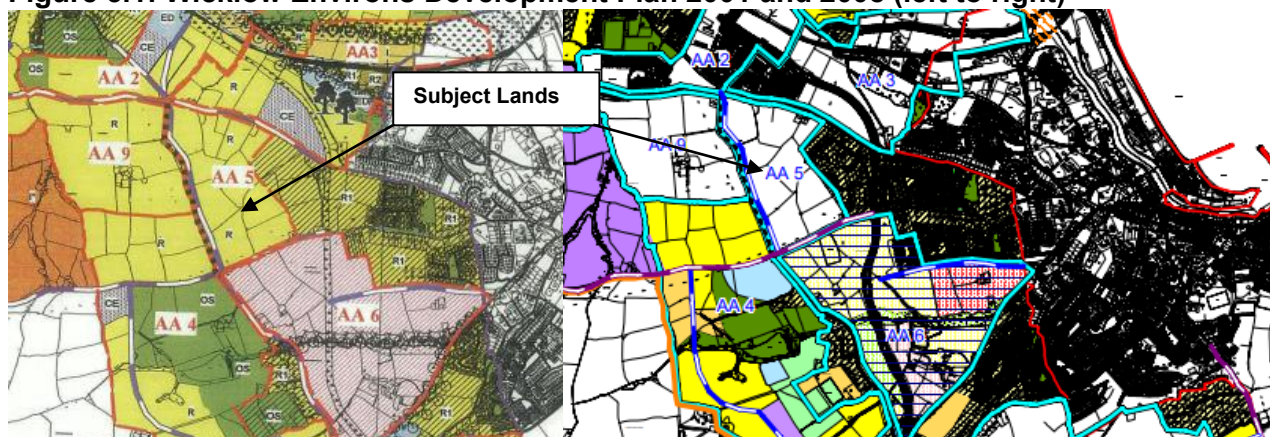
Part 8 application to carry our Road Widening works along Rocky Road, Wicklow Town from Carrig Beag Housing Development to M11 Junction to increase the carriageway width to between 5.5m and 6m throughout along with the introduction of New Pedestrian Footpath along Rocky Road to the N11 Junction.



**Figure 2.3: Part 8 Road Widening**

### 3.0 PREVIOUS ZONING OF LANDS

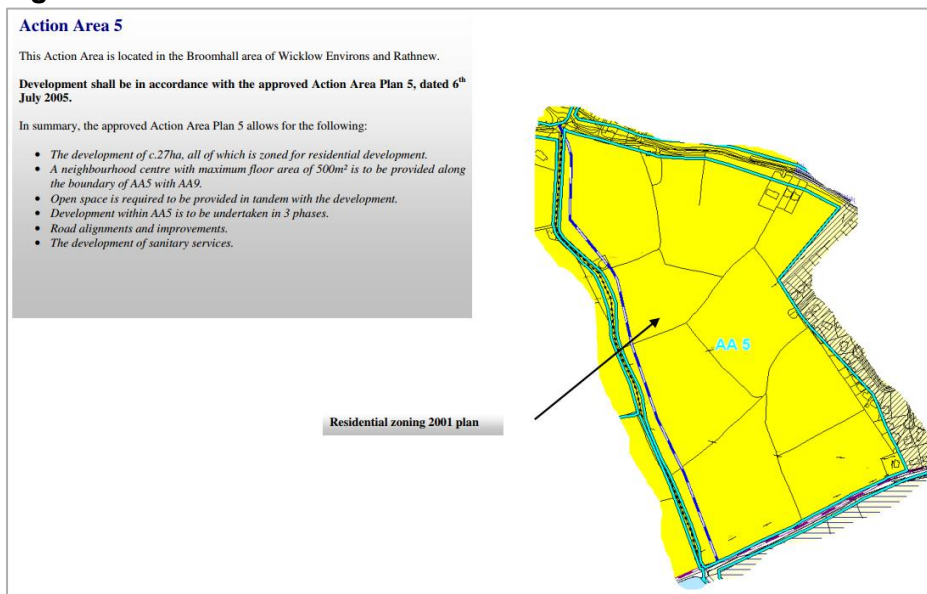
The subject lands were previously zoned for residential land use within the previous Wicklow Town & Environs Local Area Plan 2008 and partially occupied a 25ha zoned area with an indicative capacity of 700 units. The lands have been identified for residential purposes dating back as far as 2001 and were re-designated as strategic land bank within the existing Wicklow-Rathnew Development Plan 2013-2019.

**Figure 3.1: Wicklow Environs Development Plan 2001 and 2008 (left to right)**

The subject lands were previously zoned Action Area 5 'AA5' within the previous Wicklow Environs Plan 2008-2014 as part of the phased development of the lands.

It is noted that the residential zoning 'R' at 'AA5' was identified for such use by the Wicklow Environs Local Area Plan 2001 Land Use Zoning Matrix. This highlights the substantial period of time which the site was deemed suitable for residential purposes by the planning authority, having been included in the Action Area Plan 5 of 2005 and retained with a residential zoning within the Wicklow Environs/Rathnew Local Area Plan 2008-2014. This forms a firm precedent for the acceptability of residential development at the subject lands in a present day context.

**Figure 3.2: Action Area Plan 5**



Source – Wicklow Environs/Rathnew Local Area Plan 2008-2014

## 4.0 HISTORIC STRATEGIC UNDERESTIMATION IN POPULATION TARGETS

### 4.1 National Planning Framework Draft Update (July 2024)

The first Draft Revision of the NPF was published on the 10<sup>th</sup> of July 2024, in accordance with Section 20C(5)(a) of the Planning and Development Act 2000 (as amended). The Draft Revision focuses on updates to the NPF to reflect significant and sustained population growth observed since the publication of the NPF in 2018 and updates to Government policy, amongst other factors.

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.

**Figure 4.1: Draft NPF Revision Targets (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 – Draft NPF Revision (2024)

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, as per NPO 43:

### **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.

### **NPO no. 11 – Targets and Development Management**

The draft update to the NPF notes the following NPO:

*“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.”*

### **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.

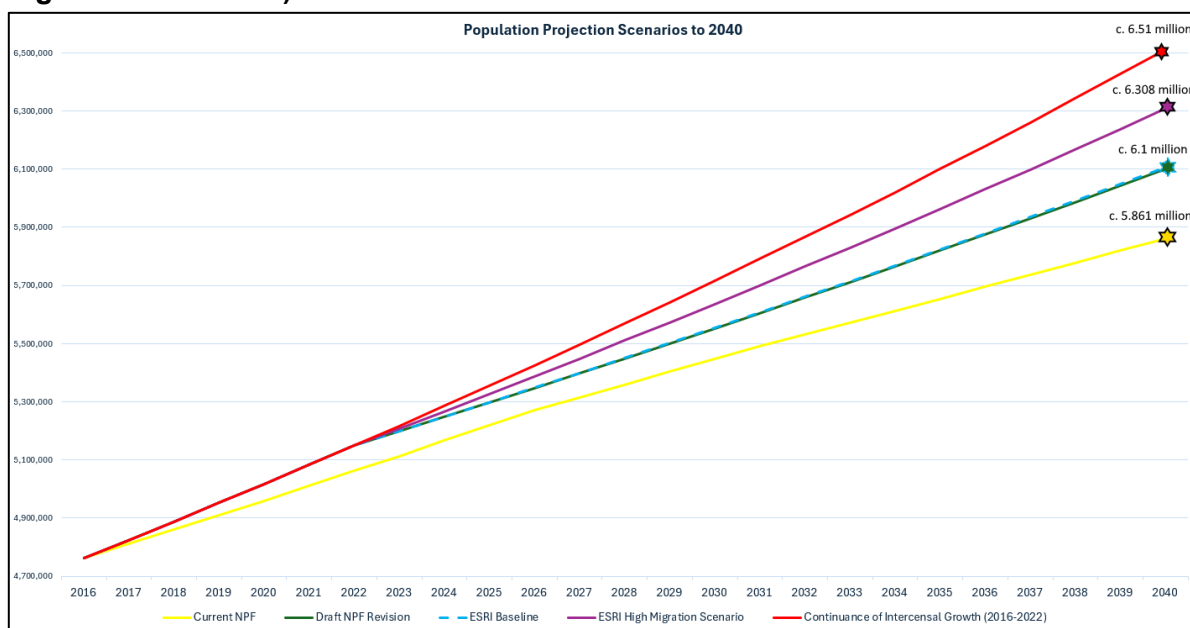
Under this assumption, the population in 2040 would be c. 411,000 people higher than provided for in the draft NPF revision.

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.

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



Source: JSA

Having regard to the above, it is considered that the lands subject of this submission (identified in Map 1) as being serviced and sequentially favourable can contribute to the much needed housing demand and additional housing required in the final update to the NPF.

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 by Government to date.

### 4.2 Housing Commission Report

According to the Housing Commission report, estimate 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, 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.*

### Average Household Size (AHS)

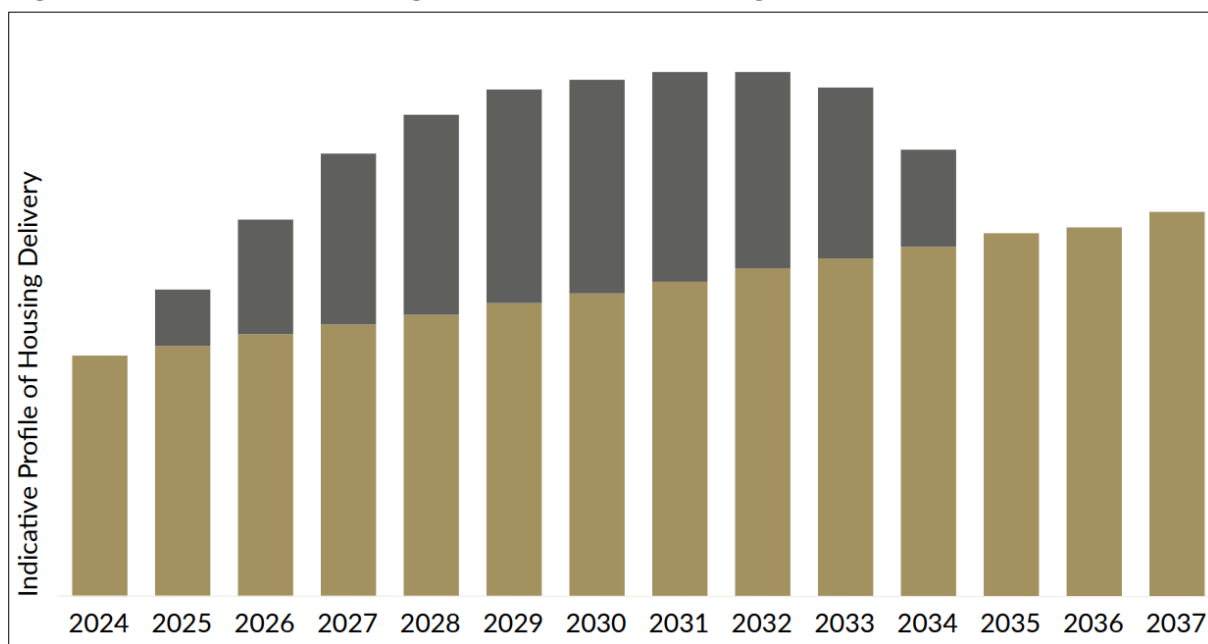
It is the view of the Housing Commission that the recent stasis in OHS in Ireland is determined by a lack of new homes, with the construction rate at a post-WW2 low during the 2010s.

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)

With reference to the above figure, it is noted that an additional 2 years of pent up demand needs to be added to the HCR figures as they were based on April 2022.

**Figure 4.2: 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 Wicklow Rathnew should allow for sufficient flexibility in the lands zoning for the settlement and rezone our client’s lands to residential.

### 4.3 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.

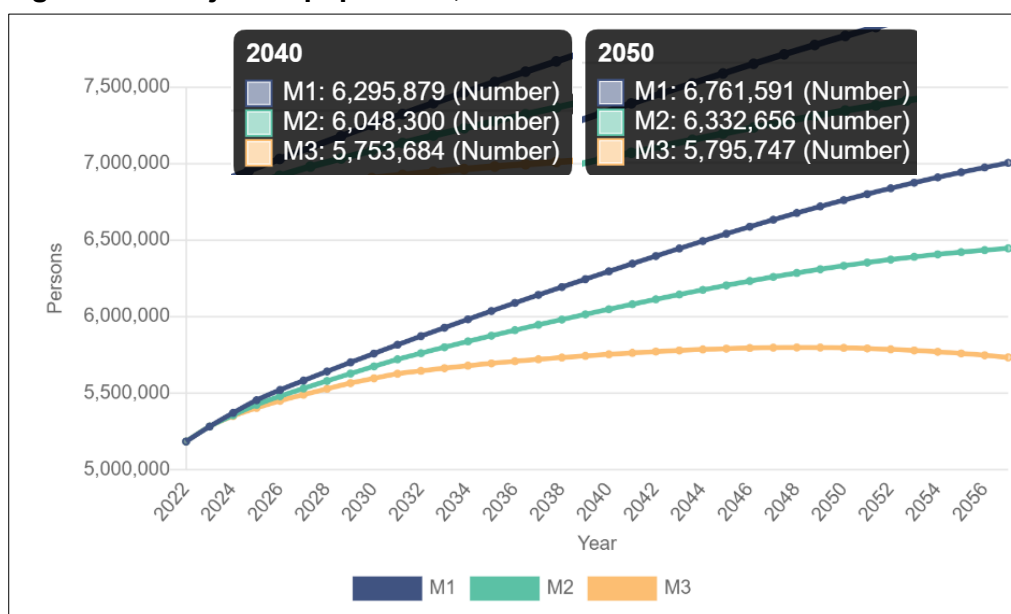
The ESRI report outlines that Ireland has experienced rapid population growth in recent years, both compared to historical experience and relative to the EU. Census 2022 data reveals that the population was 5.184 million, having increased by 422,000 or by 9 per cent since 2016. This rate of growth is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

### 4.4 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.

Figure 4.3: Projected population, 2022 – 2057



Source: Figure 2.1 CSO Projected population, 2023 – 2057

### 4.5 Population and Migration Estimates, April 2024

On the 27<sup>th</sup> 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.

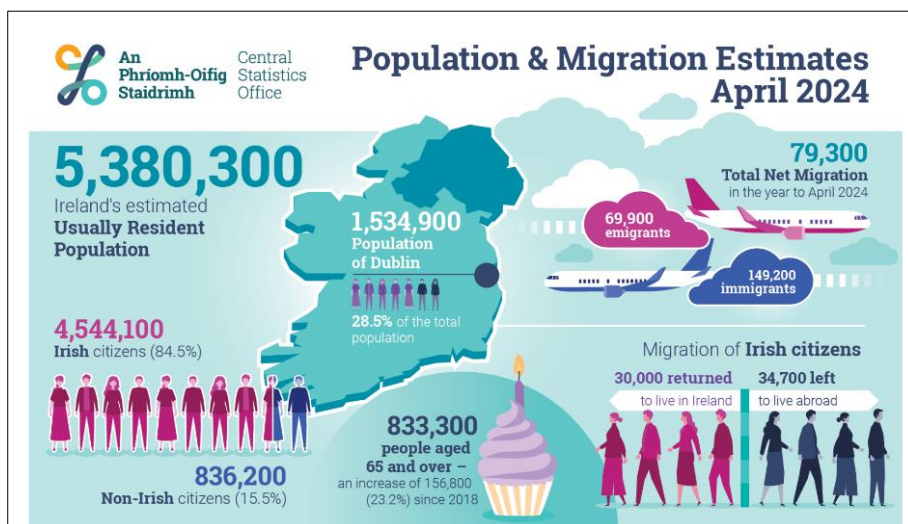
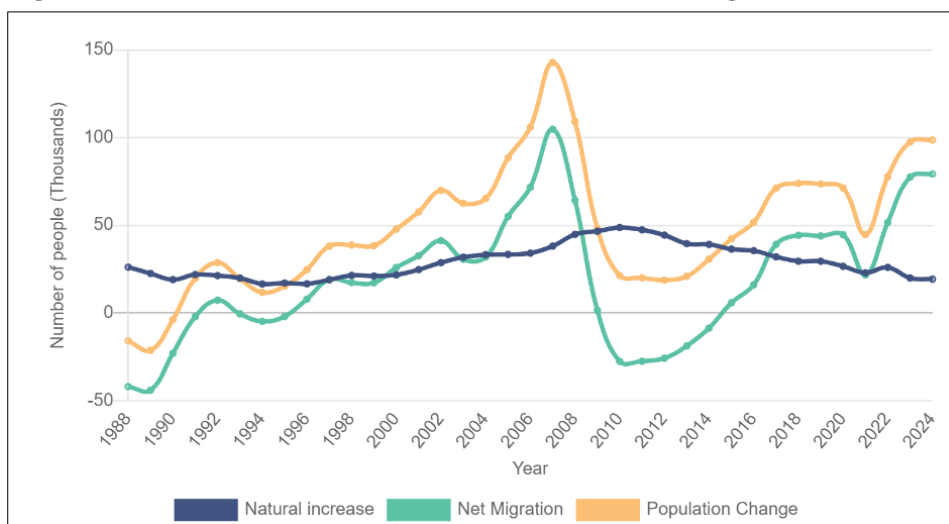


Figure 4.4: Annual Components of Population Change, 1988 - 2024



Source: CSO Figure 2 Population and Migration Estimates, 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.

#### 4.6 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."*

#### 4.7 An assessment of residential land provision in Ireland (Goodbody 2024)

Goodbody<sup>1</sup> outlines that 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.

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

The 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

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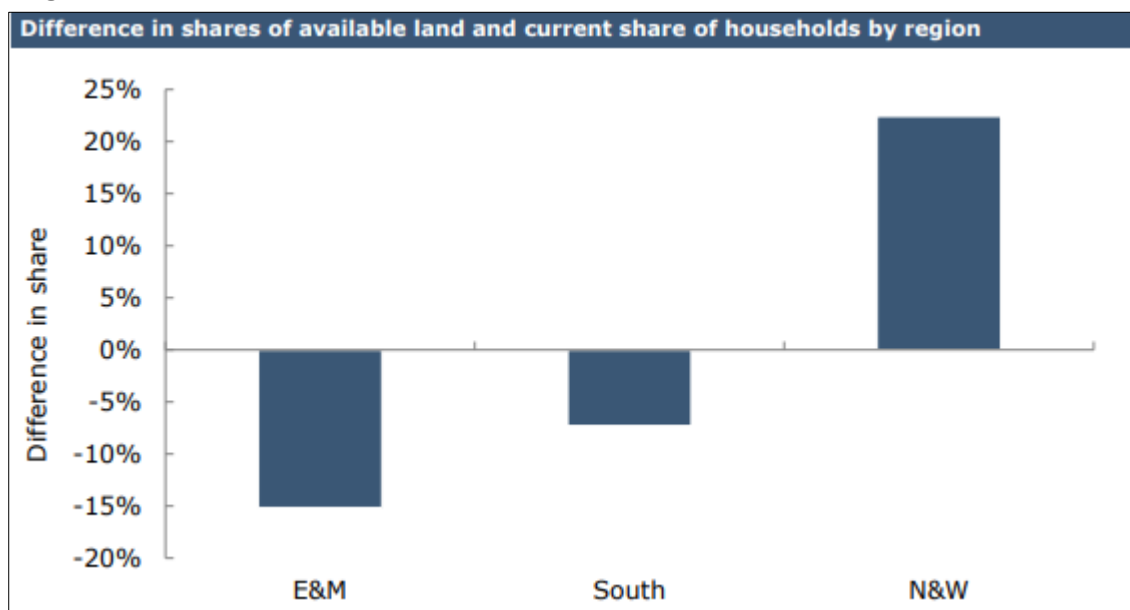
<sup>1</sup> [goodbody\\_residential-land-availability-report\\_sept24.pdf](#)



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

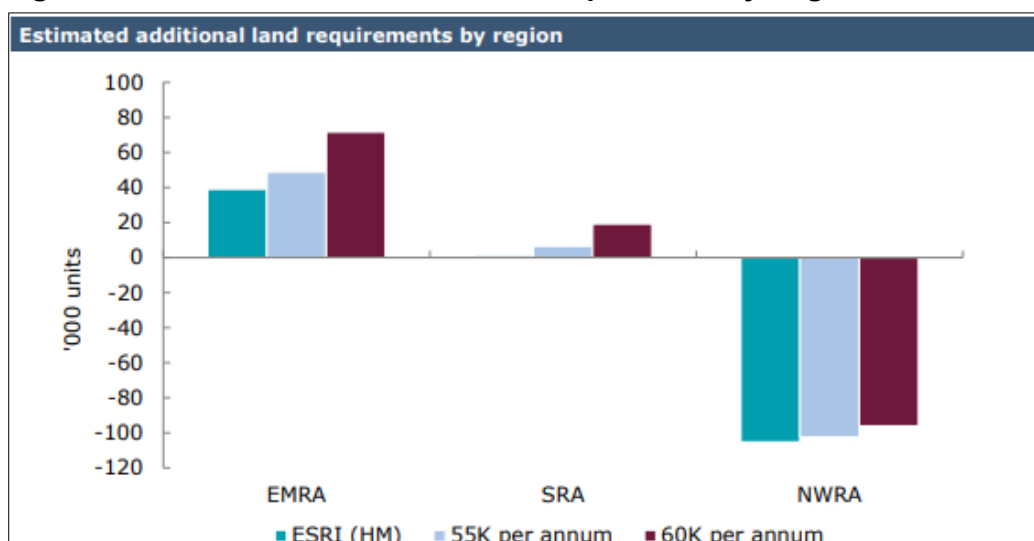
**Figure 4.5: Difference in Shares of Available Land and Current Share of Households by Region**



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 4.6: Estimated Additional Land Requirement by Region**



Source: Goodbody 2024

The Goodbody report is 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.

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 Wicklow.

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.

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.

#### **4.8 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 Wicklow-Rathnew, is household size. It is respectfully submitted that use of the average household size of 2.7 people within the Wicklow County Development Plan 2022-2028 has resulted in a failure to adequately assess and provide for the existing significant housing shortfall in the County and accordingly, the Wicklow-Rathnew (as identified in 2022). It is essential that the drafting of the new LAP considers the actual household size as recorded in the 2022 census.

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

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

Census 2022 indicates a population of 155,851 and 59,629 no. households for County Wicklow (2.6 persons per household). While the population growth is broadly in line with the 2016 plan target, housing provision has fallen short of that required by the 2016 Plan to meet

the needs of this expanded population. The shortfall between the target housing stock (in the 2016-2022 Wicklow CDP and the actual no. of dwellings recorded in the Census 2022), is some 10,193 dwellings. No provision is made in the 2022-2028 CDP Core Strategy for the identified and necessary housing to meet this shortfall.

It is therefore vitally important that the 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.

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

When looking at the composition of private households in Wicklow between 2011 to 2022, a review of census data shows that households comprised of unrelated persons only (house sharing) increased by over 70% over this 11 year period. This would suggest increased affordability constraints and undersupply in the housing market as adults are required to share accommodation to find/afford appropriate housing. Despite only comprising 2% of all private households in Wicklow in 2022, households comprised of unrelated persons constituted 10% of total household growth between 2011 and 2022. This is significant when considered in the context of the identified population growth in the area.

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

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

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

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

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

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

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

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

It is submitted that the application of the sequential approach has not been fully undertaken by the Council in the identification of RN1 and RN2 lands, particularly in the southern part of Wicklow town. It is clear that the subject lands are located sequentially to the existing footprint to the east and north.

## 6.0 SUBMISSION IN RELATION TO THE DRAFT LAP

The Draft LAP identifies a requirement for some 1,619 new homes in Wicklow-Rathnew over between 2022 and 2031. This requirement has derived from the population projections contained within the National Planning Framework 2018. It is respectfully submitted that it is particularly important to factor in actual population growth rates which have occurred since the preparation of the NPF which is based on the 2016 census data.

The 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 some residential priority lands are included in the LAP zoning map, *“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 20-40% of zoned land range nationally meaning that there may be a 60-80% shortfall in housing delivery and a consequent lack of housing delivered during the plan period. Therefore, the amount of

zoned land needed to deliver on the targets outlined in the LAP needs to take into account the historically low activation rates of zoned land.

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

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

When looking at the Wicklow-Rathnew area specifically, a review of the census population data from 2011, 2016 and 2022 shows that inter-census population growth has exceeded that of the overall county average. For example, the population of Wicklow-Rathnew increased by 17.8% between 2016 and 2022. In comparison, the average population increase across the county was 9.4%. The increase experienced in Wicklow-Rathnew is almost double that averaged across the county. This demonstrated increase in population has resulted in a direct demand of increased housing provision within the LAP lands. It is submitted that the 1,619 units identified in the Draft LAP will not meet demand. Accordingly, it is submitted that additional residential zoned lands will be required.

## **6.1 CHAPTER 3 RESIDENTIAL DEVELOPMENT**

Chapter 3 sets out the residential development strategy for the LAP area.

The Draft LAP outlines that *“Edge of centre’ locations will be considered the priority location for such new greenfield residential development and will generally be zoned as ‘New Residential - Priority 1’ (zoned RN1) while more ‘out of centre’ housing sites (zoned ‘New Residential - Priority 2’ RN2) will only be considered where Objective WTR4 is satisfied and on the basis of integrated housing / community facilities / open space schemes that can be well connected to the existing built up area.”*

The following policy is noted:

*“WTR2 Development shall extend outwards from the centre of Wicklow Town and Rathnew Village with undeveloped land closest to the centre and public transport routes given priority. ‘Leapfrogging’ to peripheral areas shall be strongly resisted.”*

With reference to the above, there are no undeveloped lands between the subject lands and Wicklow Town Centre (to O’Shea’s corner) noting that the areas between Friarshill, Rocky Road and to the north of Meadow Gate are all developed. As such the development of the lands is in accordance with the principles of sequential development and no “leapfrogging” would occur if they were zoned and subsequently developed.

Policy WTR4 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.*

While the flexibility inherent in the policy is welcomed, we would point out that from a review of the new residential zonings contained in table 3.1, there are some 32.2 hectares identified across 9 no. sites, with a further 47.6 hectares identified in table 3.2 as RN2 zoned land.

From a review of table 3.2 some 18.5 hectares (or 57%) of the new residential land meets the criteria. In order for the RN2 zoned lands to come to be developed, it would require the Tinakilly Park site (11 hectares), which represents some 34% of the new residential zonings. Therefore the entire RN2 zoned lands are dependent on 1 no. site being brought forward and which is currently identified as “*linked to essential infrastructure*”.

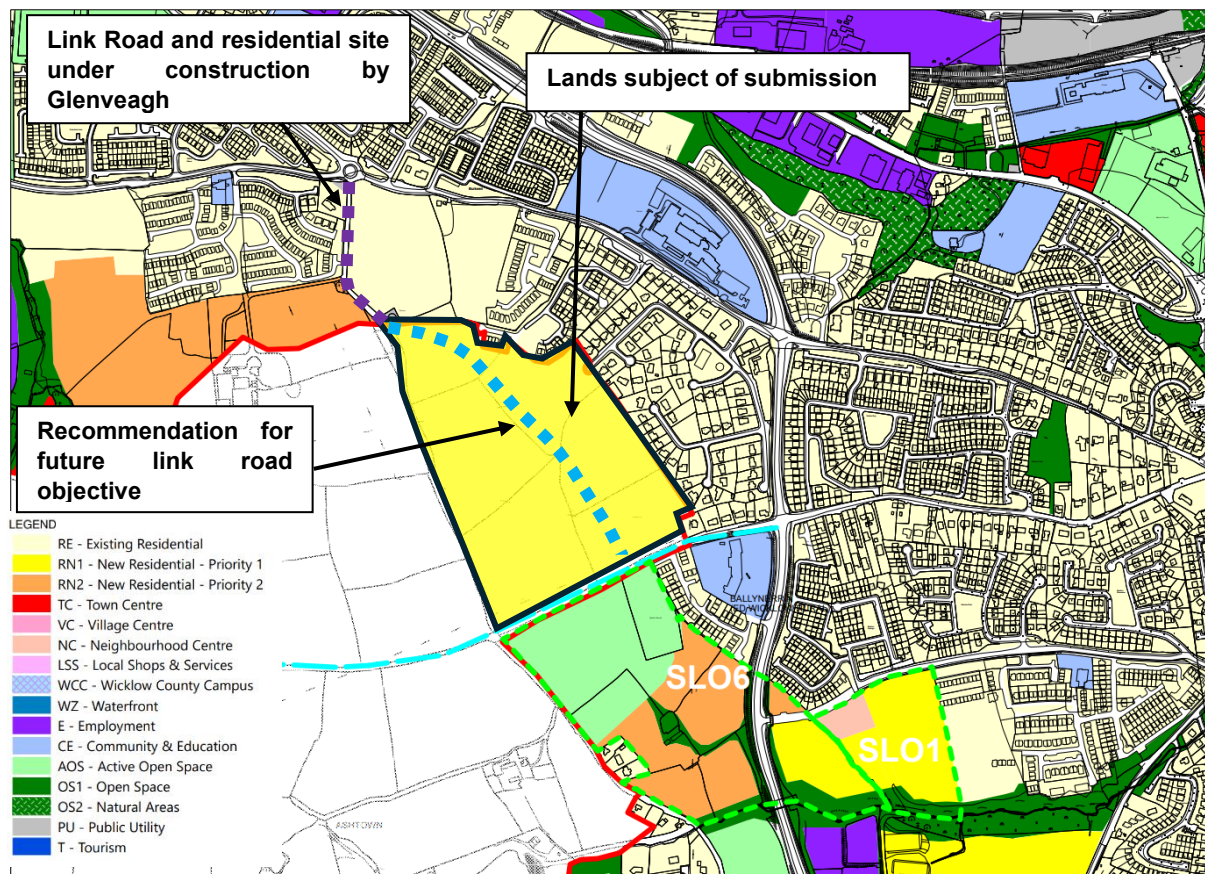
It is respectfully submitted that the entire strategy for the future development of much needed housing should not be dependent on a single site. In this regard we would recommend that some additional new residential zoning is provided within the LAP area to allow sufficient flexibility to deliver upon the existing housing and future housing requirements arising from the update to the National Planning Framework. It is clear that the lands identified in this submission are ideally placed to progressed as the lands are tier 1 lands and sequentially located and furthermore Glenveagh Homes are on site immediately to the south of the lands.

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

- The consolidation of the area will contribute to meeting the housing growth target of c.1,619 from 2022 to 2031.
- It will contribute to compact growth and consolidation of the urban form of Wicklow, thereby contributing to sustainable development (NSO 1, NPO 3a and NPO33 of the NPF).
- The strategic consolidation lands are readily serviced by extension of existing services and are all accessible by road and cyclepaths/footpaths.
- Prioritisation of the area as tier 1 development lands would accord relevant policy provisions (Wicklow CDP Core Strategy and Development Plan Guidelines 2021)
- Wicklow Town - Rathnew is designated as the Level 2, ‘Key Town’ within the Core Region; a large economically active service town and county town, with high quality transport links and the capacity to act as a growth driver to complement other growth centres in the region.
- Wicklow Town is serviced by rail and bus and is located on the N/M11 strategic transport corridor. Wicklow port is of regional significance.
- There is a population allocation of c.18,500 persons for 2028 (from a population of c.14,100 persons in 2016).

It is noted that the permitted development to the north included the first section of a potential distributor road between Broomhall Crescent and Rocky Road/Ashtown to the south. It is recommended that the adopted LAP includes a road objective so as to provide an enhanced interconnected road network in the area. The development of the lands would also allow for the provision of footpaths along the Rocky Road (as they relate to Glenveagh lands).

**Map 1: Extract - Map showing existing zonings and Sequential Expansion of Wicklow**



We would recommend the inclusion of an SLO for the Lands to ensure the phased development of the lands in question. We refer the Planning Authority to the concept drawing below which we trust is of benefit:

The driver for the layout was to retain the existing hedgerows while also aligning the road network to run parallel as much as possible to the site contours.

Some community use / sheltered housing use as well as a creche is also included

**Map 2: Proposed Concept Diagram**



## 6.2 Proximity of Subject Lands to Services

The Draft LAP states that *“While there is potential for development in the Ashtown / Hawkstown / Ballynerrin Upper areas to the south-west of Wicklow Town, particularly those areas connected to the Hawkstown Road, these areas are quite distant from the town centre and essential services and would not present the most sustainable development option.”*

It is submitted that this statement in the LAP does not take into account fully the location of the subject site and its proximity to existing social infrastructure.

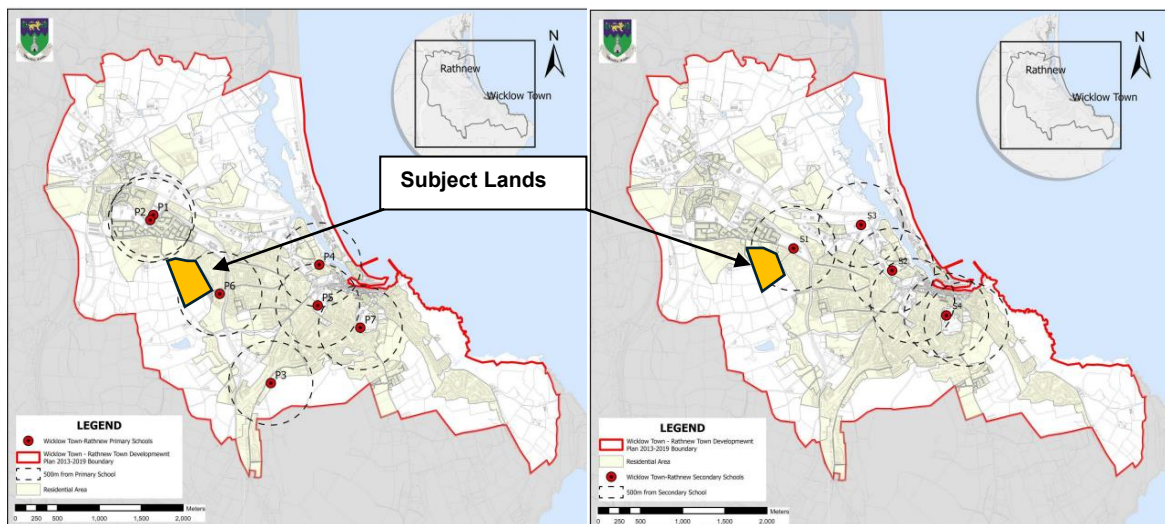
Furthermore we would note that the subject lands are sequentially located to existing development to the east north (under construction) and to the north west.

In addition, it is highlighted that the subject lands are located closer to the services and facilities located in Wicklow town centre which is a Level 2 Major Town Centre & County Town Centre compared to some of the less advantageously located sites in Rathnew, which would have to travel further for the higher order comparison shops as well as the range of social



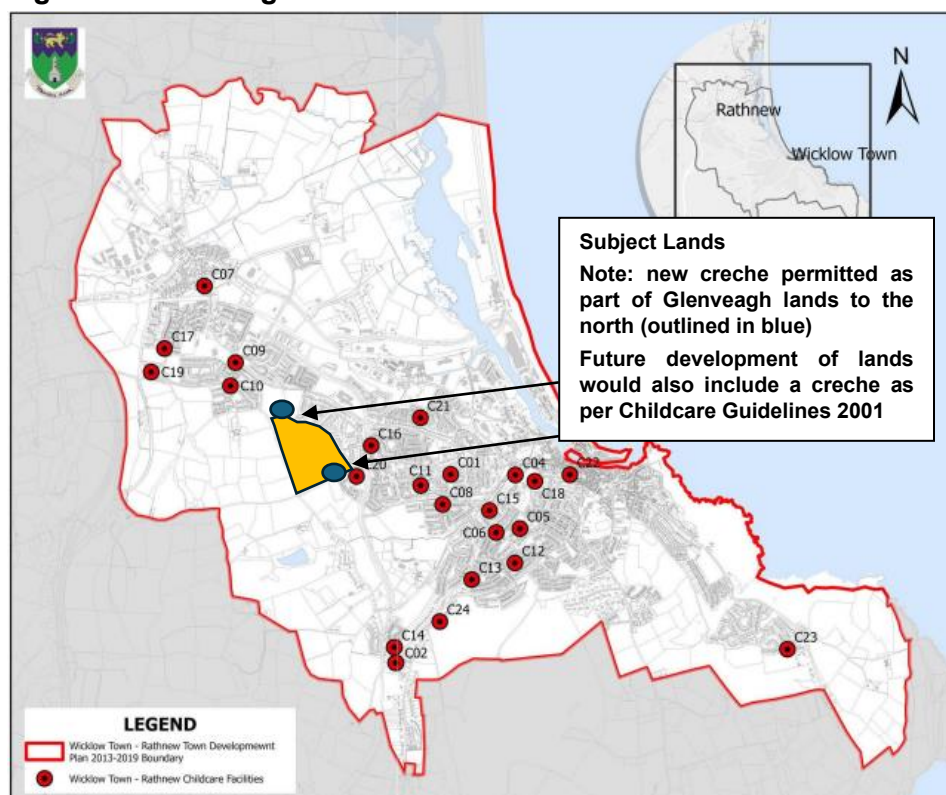
facilities in Wicklow town centre. While there are some lower level services available in Rathnew Village (which is a level 4 small town), existing and future residents particularly in the areas adjoining the M11 motorway would have to travel further (c. 3.5km) to avail of the higher quality range of goods and services available in Wicklow town centre compared to the lands subject of this submission (c. 1.6km).

**Figure 6.1: Existing primary and secondary schools with 500m of Subject Site**



Source: Map 5 & Map 7 Appendix 2 Draft Wicklow Rathnew LAP 2025

**Figure 6.2: Existing Childcare Facilities**



Source: Map 11 Appendix 2 Draft Wicklow Rathnew LAP 2025

The subject lands are entirely free of any constraints relative to infrastructure and landownership, with no notable barriers to development existing at present. Therefore, the subject lands should be identified as a high priority for development as Priority 1 zoned lands. It constitutes Tier 1 land and is 'ready to go' development land which is not dependent on any other landholding for delivery. Glenveagh are currently constructing the lands adjacent to the north and have a proven track record in delivering much needed residential development at scale.

The subject site is located within 500m of local schools, e.g. Educate Together Wicklow National School and Colaiste Chill Mhantain. In addition, the subject site is also located adjacent to locally scaled retail development located adjacent to the north west and also future local zoned.

### **3.0 CONCLUSIONS**

Glenveagh Homes Ltd., welcome the preparation of the Draft Wicklow-Rathnew Local Area Plan 2025. This is an important policy document for the future development of Wicklow-Rathnew which is a Key Town in the RSES for the EMRA.

It is respectfully submitted that the final Wicklow-Rathnew LAP 2025 takes into account this submission in respect of the additional zoning indicated on map 1 and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing.

Yours sincerely,



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**John Spain**

*Managing Director John Spain Associates Ltd.*