



Comhairle Contae Chill Mhantáin

WICKLOW COUNTY COUNCIL

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NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community and Local Government

10 November 2017

Dear Minister,

Following the discussion of the draft NPF by Wicklow County Council on 06.11.17, the members of Wicklow County Council have requested that I present their observations and concerns to you¹:

1. Framework process

A number of members raised concerns about the short period of time that has been allowed for public consultation on this very significant and drastic policy document. Some members consider that this process has been rushed and significant additional time is needed to consider all of the contents of the proposed stargey and its implications.

2. Population growth parameters

Overall, there is concern when one takes into account all of the various targets and growth parameters, that there will be limited options for new residential development in the country, other than in the main cities. The key concern is the impacts this will have on rural towns and areas, leading to a decline in rural areas, lack of housing choice and additional pressure in cities and metropolitan areas, which are lacking in the infrastructure to accommodate such high levels of growth.

(a) Growth of Dublin

It was felt by a number of members that the lack of new housing in Dublin City, particularly between the canals, is a key factor driving the sprawl of the city out in into the suburbs and beyond to adjoining counties, with the result problems of car dependency and traffic congestion on strategic routes outside the city. It was considered by some that Dublin City

¹ These are some of the views expressed at the meeting. These views should not be taken as representative of all view points, or even the majority position. A number of members will be making individual submissions also.

*Tá an doiciméid ar fáil ar iarratas i bhformáid eile/malartach.
This document is available in alternative formats on request.*



Council has not delivered on its targets, and measures are required to ensure that Dublin generated housing demand is met in Dublin rather than in surrounding counties.

(b) Growth in towns > 10,000

With respect to the target growth of 20-25% for larger towns, and the target that 30% of such growth shall be located in brownfield / infill sites, some members considered that this fails to acknowledge that in many larger towns, there is a serious lack of available land to meet such parameters.

(c) Growth in towns < 10,000

Many members were extremely concerned about the proposal to limit that growth in towns < 10,000 to 15% over the next 22 years (Objective 14). It is considered that this limitation will have significant ramifications to the ongoing enhancement and strengthening of many strong medium sized towns and would be totally at variance with the Wicklow Core Strategy population targets and zoning provisions, drawn up in accordance with current NSS and Regional Planning Guidelines for the Greater Dublin Area.

It is considered that this parameter, coupled with further restrictions on rural development, will have the effect of further decline in such towns, which are very much dependent on the hinterland population using such towns for services.

There is concern that the limitations on growth suggested would result in a serious lack of investment in enhanced / new service infrastructure in such towns, which already are lacking in the basic services to serve their existing populations. It is considered that such restrictions on growth would provide a justification for service providers (such as Irish Water) to limit or avoid new investment in such locations.

(d) Impact of Brexit

The draft document does not adequately address the potential impact on population movement arising from Brexit.

3. Rural housing

The members are especially concerned with the impact on rural Ireland and in particular on social and family networks of proposed objective 18b. The majority of County Wicklow would possibly be considered to be within the urban influence of Dublin and the larger towns within the county and as a result of this proposed policy, rural housing development would be limited to those with a 'demonstrable economic need', and elsewhere this is restated as 'necessary to demonstrate a functional economic requirement for housing need'. This is contrary to previous guidelines which made explicit provision for those with a social need to live in the rural area. It is considered that there are those, such as immediately family members, children of farmers etc that would be precluded from living on their own family holding by this policy, which would have serious adverse

implications for rural stability, for family networks and could result in rural isolation if family members cannot stay close by to care for aging parents.

The Minister is reminded that a very small proportion of those living in rural Ireland are farmers, and of those, only every small percentage would be full time farmers. To restrict rural housing essentially to farmers would effectively 'close down' the development of rural housing in the country.

The Minister is reminded that existing rural housing provisions are already very strict, particularly in Wicklow, and it is unthinkable that the rules would be made even stricter. There are many 'obstacles' to securing permission for a rural house, such as landscape and nature consideration, views, house design and siting, wastewater disposal, traffic safety considerations etc and to add another barrier would be a 'nail in the coffin' for rural Ireland.

Some members consider that this proposed objective demonstrates that the Minister and the Department are very out of touch with rural Ireland and that do not appreciate the controversy and objections that such a provision will generate.

It is suggested that this is an ill thought out reaction to the 'Flemish' ECJ judgement.

4. Social housing

There is concern that the draft framework does not address social housing or affordability in a meaningful way. There are concerns that the limitations and targets set out in the draft framework for town growth will have knock-on impacts on the ability to deliver the required quantum of social housing needed in any area based on demand. Furthermore, there is concern that the concentration of housing into the cities and a small number of larger towns will have the effect of driving up prices in those areas, with resulting impacts on affordability. In accordance with the principles of the draft framework, there would be limited options for those wishing to purchase in cheaper locations, as limited housing would be available in smaller towns and villages.

5. Infrastructure delivery

There is concern that housing delivery in the past, which occurred on foot of targets from the Government and Regional Authority, has not been matched by necessary infrastructure provision and that this situation will persist into the future. It was put forward that a result of this failure, we now have a failing transport system in the GDA. There is concern that the principles of the draft framework will in fact divert investment away from the GDA further compounding this problem.

There is serious concern about the current and future the alignment of Irish Water investment plans with the principles of existing NSS / RPGs and any future national / regional planning frameworks.

6. Employment growth

There is concern that the framework fails to adequately address the employment imbalances in the GDA which is driving commuting in the region.

7. Tourism

It was pointed out that there is very little in the draft framework about tourism especially in rural areas, and it fails to acknowledge that development in the rural area, for example of tourism accommodation, is a cornerstone of our tourism industry.

Is mise le meas,

Frank Curran

Chief Executive

Wicklow County Council