



# Comhairle Contae Chill Mhantáin

WICKLOW COUNTY COUNCIL

Forbartha agus Pleanála - Planning and Development

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

10 November 2017

Dear Minister,

The executive of Wicklow County Council welcomes this opportunity to comment on your recently published **draft National Planning Framework**.

We would be broadly supportive of the overall aims and principles of the draft framework and we appreciate that this is a high level strategy, with overarching and generalised objectives and that the 'detail' of how these objectives are to be implemented at the local level will come through the forthcoming **Regional Spatial and Economic Strategies**.

We do have one immediate concern however that we would like to bring to your attention, and that relates to the high level population targets and the growth parameters set out in the draft document, in particular

**Section 3.6** *'Within both the Eastern and Midland and Southern Regional Assembly areas overall targeted population growth for large towns with >10,000 populations in 2016 should generally be 20-25% which is ahead of projected national average growth'*

**Objective 14** *'Ensure that the targeted population growth of Ireland's small towns and rural areas to 2040 is proportionate, at a targeted average rate of 15%....'*

We have compared these growth parameters to our existing Core Strategy, which is fully compliant with the current regional plan, and the results are concerning. In particular:

- (a) The 2040 population of County Wicklow, using the draft NPF parameters, would be in the region of 171,574 (a growth rate over 22 years of c. 20%). Compared to our current population target for 2028 of 176,000, the principles of the draft NPF would see a reduction in overall growth in County Wicklow, and over a much longer timeframe.

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

Seoltar gach comhfheargras chuig Stiúrthóir Seirbhísí, Forbartha agus Pleanála.  
All correspondence should be addressed to the Director of Services, Planning and Development.



If one were to extrapolate the NPF 2040 target back to 2028, the overall county target would be in the region of 157,000 – a stark reduction in growth in Wicklow, from the current 24% between 2016 and 2028, down to 10% over the same period.

We would draw your attention to the historical pattern of population growth in County Wicklow over the last 20 years. Over the 1996-2006 period, population grew from 102,683 to 142,435 – a growth of 39%. This 20 year period included periods of both rapid growth but also of relative stagnation, which is to be expected in any longer period (such as the next period up to 2040), and is seen as a decent ‘comparison’ for the next 20 years. This period saw Wicklow institute one of the most restrictive rural (open countryside) housing policies in the country as well as strong management of urban development, resulting in over 85% of all new population being located in the towns of the County. During this period, Wicklow, alone in its region, rigidly implemented the population targets of the RPGs, unlike many of our neighbours, resulting in a much lower population increase. Therefore overall, with strong development in the towns, controls in the open countryside and strict adherence to regional plans (all key parameters of the draft NPF), the population of County Wicklow still grew by 39%.

The draft NPF provides for a drastically reduced overall growth rate over 22 years of 20% for Wicklow.

- (b) Doing this exercise for our designated growth towns, we have determined that the NPF principles would result in a significant reduction in growth in many of our major towns, which are targeted for substantial growth currently in accordance with the current Regional Planning Guidelines for the Greater Dublin Area e.g.

	2016 population	Current 2028 target	NPF 2040 target <sup>1</sup>	NPF 2028 target <sup>2</sup>	Difference 2016-2028
<b>Bray</b>	29,339	40,000	40,750	36,675	-3,325
<b>Wicklow – Rathnew</b>	13,954	24,000	17,443	15,698	-8,302
<b>Arklow</b>	13,163	23,000	16,454	14,808	-8,192
<b>Greystones - Delgany</b>	18,140	24,000	22,675	20,408	-3,593
<b>Blessington</b>	5,520	7,500	6,348	5,934	-1,556
<b>Newtown</b>	2,835	6,000	3,260	3,048	-2,952

<sup>1</sup> 25% growth

<sup>2</sup> Extrapolated back from 2040



This situation is replicated when a 15% growth rate is applied to our medium sized and small towns with very pronounced results e.g.

	2016 population	Current 2028 target	NPF 2040 target <sup>3</sup>	NPF 2028 target <sup>4</sup>	Difference
<b>Ashford</b>	1,425	3,250	1,639	1,532	-1,718
<b>Aughrim</b>	1,442	2,000	1,658	1,550	-450
<b>Baltinglass</b>	2,137	3,000	2,458	2,297	-703
<b>Carnew</b>	1052	2,000	1,210	1,131	-869
<b>Dunlavin</b>	838	2,750	964	901	-1,849
<b>Enniskerry</b>	1889	2,500	2,172	2,031	-469
<b>Kilcoole</b>	4239	5,000	4,875	4,557	-443
<b>Rathdrum</b>	1663	3,500	1,912	1,788	-1,712
<b>Tinahely</b>	937	1,500	1,078	1,007	-493

We have serious concerns in these regard, in particular:

- This would run contrary it seems to the overriding goals of the NPF to enlarge, enhance and strengthen our major and medium sized towns, in an effort to make most efficient use / get the best return from investment in services and reduce the pressure for development in smaller towns / the rural area, which either have poorer or no services;
- This level of reduction, which would be particularly pronounced in Wicklow – Rathnew, Arklow and Newtownmountkennedy, would potentially undermine and trigger a review of current investment plans for these locations, as the ‘business case’ or potential returns / potential customers would be significantly diminished;
- Such a reduction in growth would obviously result in significantly less new housing development in these locations, resulting in less consumer choice with regard to purchase location, house types etc;
- Such a new target would require a very substantial reduction in zoned residential land, which is likely to be practically and politically challenging, coming after a phase of ‘down zoning’ post 2010; this runs completely contrary to our current Core Strategy which has identified that all of the four large growth towns (Bray, Wicklow-Rathnew, Arklow and Greystones – Delgany) are currently ‘under zoned’ having regard to our population targets for 2028 and we are currently in the process of drawing up / adopting LAPs for these towns that entail additional new zoning, rather than down zoning;
- In a number of these settlements, significant development is occurring and there are significant numbers of extant permissions that are quite likely to be initiated in the short to medium term as the economy recovers; therefore these reduced targets in some instances would be already be set to be ‘breached’ in the medium term.

<sup>3</sup> 25% growth

<sup>4</sup> Extrapolated back from 2040

We would remind the Minister that all of the existing growth targets for our major and medium sized towns accord with the targets of the NSS and the current RPGs, and have been deemed compliant by both the Minister's department and the regional authority.

We would also request that the NPF would address the strategic importance of the N/M11, as part of Euroroute 1, providing the transport artery from Dublin City to Rosslare, via Wicklow and Wexford. We would consider that addressing the deficiencies in this route, in particular the M50 / M11 merge, of vital importance to both the Dublin city region but also to County Wicklow.

Is mise le meas,

Frank Curran

Chief Executive

Wicklow County Council