

From: derek mitchell [REDACTED]
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To: National Planning Framework
Subject: Submission to National Planning Framework 2040

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Submission to National Planning Framework 2040

There is a need to plan the population expansion in a much closer way to job location and transport improvements. Currently the Department of Environment has handed down population targets to Councils through Regional bodies. Planning Authorities must have regard to them, they are effectively compulsory. This has meant that the Wicklow County Development Plan to 2022 has to provide zoned land for an extra 40% of population. However the National Transport Authority is not planning any significant improvement in the capacity of the N11/M50 nor the Wicklow rail line south of Bray. The NTA uses much lower population projections which it refuses to discuss with the Council. This will result in major congestion.

Wicklow has a very high level of outward commuting with Greystones-Delgany having 88% commuting outwards (mostly to Dublin) as industry has not set up in the area in spite of land being zoned for employment. Land has been zoned for employment for 35 years but has not been developed, including land owned by the IDA. The compulsory population targets mean that extra houses are planned to 2022: Greystones 5,034, Arklow 5,726, Wicklow 6,272 and Bray 7,934 extra. (About a 40% growth) Thus the 'doughnut' growth around Dublin will be continued as a result of DOELG compulsory targets. Not nearly enough growth is directed to Dublin city which needs to build more densely.

Planning Authorities and Bord Pleanala need to be empowered to refuse residential growth unless a certain proportion of jobs are provided locally and also until certain specified transport improvements have been made. Councillors are informed these can not be put in as conditions in these plans at present.

There is also a danger that sewerage capacity will be used up by these houses and if industry wants to locate there will not be enough sewerage capacity. We are informed that sewerage capacity cannot be 'booked' for future commercial growth. This needs to change to allow sewerage capacity reservation for future jobs.

The NPF asks what alternative strategies should be adopted. The DOELG compulsory population targets and consequent rezoning have set the future 'doughnut' growth for the next decade at least and infrastructure investment needs to keep up with that policy before investment is made in other regions.

Sincerely
Derek Mitchell

Councillor Derek Mitchell, member of Wicklow County Council FG.
"Turning Vision into Reality"



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