



Variation No.6

Who are you:	Private Individual
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Reference:	VAR6-165734
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- Chapter 6 – Proposed Variation No. 6
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Shane Stokes submission proposed variation number 6.pdf, 1.09MB

To: 'Variation No.6, Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town.' (via online upload)

Dear Wicklow County Council,

I wish to make a submission in relation to Proposed Variation No. 6 of Wicklow County Development Plan 2022-2028.

I am writing from Newtownmountkennedy and most of this submission is in relation to that location.

Firstly, I note and welcome that the council believes that the land currently zoned throughout the county is sufficient to meet the increased housing targets.

I also welcome the same statement in relation to Newtownmountkennedy.

As you are aware, this town has been the subject of rapid growth in recent years. In the draft CDP report by the previous Wicklow County Council Chief Executive https://www.wicklow.ie/Portals/0/adam/Documents/M6I3YqscRk2c9IU0GIa1pQ/Link/Section3_Summary%20and%20assessment%20of%20submissions.pdf, he acknowledged on page 335 that the Newtownmountkennedy's growth under the-then version of the National Planning Framework should not exceed 30%.

However he recognised that the likely growth rate would likely exceed 70%. Since then further planning permissions have been granted, underlining the extent of Newtownmountkennedy's rapid expansion.

The new Wicklow Core Strategy (Chapter 3 – proposed variation) sets a 2022-2031 housing growth target of 892 units. This is a 60% increase over the 2022 figure of 1,486, a very substantial surge for a level 4 town.

Table 3.5 deals with targets between 2025 and 2031. When units under construction and those permitted but yet to be commenced are considered, this data shows that just 55 additional units requiring planning permission are needed to satisfy the 2031 growth targets.

I understand that since table 3.5 was generated, a further 21 units have been granted via application number 2460778.

I note, and welcome, that the council states enough zoned land is currently available to satisfy the growth requirements.

An opportunity to recalibrate:

Newtownmountkennedy is named as a level 4 settlement (Core Region Self-Sustaining Town) in the proposed variation of the CDP.

This provides the definition:

"Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining."

According to the consultants ACT (Accelerating Change Together), who compiled the new Town Centre First Masterplan, the rapid growth of the town has placed 'increasing pressures on existing commercial, educational and community services.'

It notes one of the major challenges facing Newtownmountkennedy is the lack of local employment.

ACT states that 77.73% of people work outside the town, with just 22.27 employed locally. Just 13% commute by public transport.

These statistics are far more pronounced than the national average.

Another very significant challenge for the town is identified by ACT on page 31 of the Masterplan.

“More than 60% of households are families with children, which highlights existing pressures on local education. The town currently lacks a secondary school. This shortfall is expected to become more pronounced as the population continues to grow.”

It notes on page 30 that “Children aged 0-14 make up 25.6% of the population, compared to 19.66% nationally.”

Securing a secondary school is a major priority for those living in Newtownmountkennedy. At present students need to travel to Greystones, Kilcoole or further afield to attend these schools, with parents most often needed to provide transport due to a lack of bus services.

Combined with the very high commuting rate for employment, this has significantly added to the traffic on the N11, M50 and elsewhere.

A Modal Split table was provided on page 90 of the Chief Executive's report (Section 3 Assessment of Submissions) when the 2022-2028 County Development Plan was compiled.

https://www.wicklow.ie/Portals/0/adam/Documents/M6I3YqscRk2c9IU0GIa1pQ/Link/Section3_Summary%20and%20a%20of%20submissions.pdf

This showed that in 2016, 72% of trips to work and school were by private motor vehicles. Only 18% were by public transport, and a mere 10% were active (ie walking or cycling).

Modal Split (trips to work and school)	Active		Public Transport		Private vehicles	
	2011	2016	2011	2016	2011	2016
Bray	21%	20%	21%	21%	58%	57%
Wicklow - Rathnew	18%	15%	8%	10%	74%	75%
Greystones- Delgany	10%	11%	22%	22%	68%	67%
Arklow	22%	24%	5%	5%	72%	71%
Blessington	19%	19%	9%	10%	72%	71%
Baltinglass	28%	34%	4%	4%	68%	62%
Enniskerry	6%	5%	18%	17%	76%	78%
Kilcoole	17%	17%	15%	16%	68%	67%
Newtown	12%	10%	17%	18%	71%	72%
Rathdrum	22%	24%	7%	6%	72%	70%

The ACT-presented statistics show that private vehicle use has grown further since then, with the lack of local jobs and education challenges being a very considerable factor in this.

This high rate of car usage has added to the N11 gridlock and is also a challenge to the sustainability and climate goals specified in the National Planning Framework and the Wicklow Climate Action Plan 2024 – 2029.

Given the lack of local employment and education, as well as the dearth of other needed facilities and services, I believe the coming years represent an important opportunity to rebalance and to address these challenges in Newtownmountkennedy.

Table 3.5 of the Wicklow Core Strategy (Chapter 3 – proposed variation) shows that the town is already well on course to meet its 2031 housing target.

In that light, and in considering the lack of employment, education and other facilities in the town, it is my hope that the council will stick with this 2031 target rather than zoning additional land and requiring further units in excess of that.

The years ahead provide an opportunity for the current imbalances to be addressed and much needed supports to be added to the town before any future expansion.

Density considerations:

I note in Chapter 6 that density on the edge of towns like Newtownmountkennedy is proposed to increase from a current recommendation of 20 and 35 dwellings per hectare to between 30 and 50 dwellings per hectare.

The proposed variation also states that “up to 80 dph (net) shall be open for consideration at ‘accessible’ suburban/urban extension locations.”

I understand the rationale for an increase to be made. However I would ask that the council recognises the amenity and privacy consideration of existing residents on the outskirts of towns, and also the potential imbalance of new estates further out of town having higher densities than those currently in place on the outskirts.

In particular reference to the 80 dhp (net) proposal, page 9 of chapter 6 states of the new proposals that ‘it is important that minimum densities are achieved and exceeded where local conditions allow, except where insurmountable impediments arise. In this regard, the guidance and assessment criteria set out in the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ (DoHLGH 2024) shall be applied.’

However under that guideline document, Newtownmountkennedy doesn’t appear to meet the standard for ‘accessible’ suburban/urban extension locations.

Firstly, it lacks a rail line. As regards bus services, table 3.8 of that document defines an accessible location as lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

Newtownmountkennedy doesn’t have a bus service running every 10 minutes.

Indeed the inadequacy of the bus service in the town is an issue which has persisted for many years.

SEA Screening:

In relation to the SEA Screening document, I would like to echo the concerns expressed by the Wicklow Planning Alliance in its submission. That states that:

“The WPA are also concerned that the SEA does not offer a realistic analysis of the impact of increasing the number of units by increasing densities as proposed in this amendment. Each new house means another car on the N11 as the public transport services are not a substitute in terms of time or comfort. The N11/M50 are at a limit and congestion reaching a tipping point with potential future social disruption.”

Given the large increase in carbon emissions which will be generated by the additional cars, I would ask that the council considers potential shortfalls in the SEA Screening and takes measures to address this.

Thank you, best regards,

Shane Stokes