

	<h1>Variation No.6</h1>
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Who are you:	Private Individual
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Reference:	VAR6-180734
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WCC Planning Department
Online Portal Submission

***RE: Submission on Proposed Variation No. 6 to the Wicklow County Development Plan 2022–2028
Core Strategy Housing Quantum, Deliverability and Contingency in Wicklow Rathnew***

Dear Sir or Madam,

RE: Submission on Proposed Variation No. 6 to the Wicklow County Development Plan 2022–2028
Core Strategy Housing Quantum, Deliverability and Contingency in Wicklow Rathnew

I wish to submit in relation to Proposed Variation No. 6 of the Wicklow County Development Plan 2022–2028, published in December 2025. This submission addresses the revised housing quantum, the Core Strategy methodology, and, in particular, the absence of explicit contingency and deliverability headroom within the settlement-level land allocations for Wicklow Rathnew.

This submission is made at a strategic level to ensure that the revised Core Strategy is demonstrably capable of delivering the required housing quantum within the life of the plan, in accordance with national planning policy, Section 28 guidance, and the delivery-focused approach now consistently applied by the Office of the Planning Regulator.

Proposed Variation No. 6 reflects the revised housing growth requirements arising from the National Planning Framework First Revision 2025 and the associated Housing Growth Requirements Guidelines. The revised figures represent a material increase in required housing delivery across the county and place a heightened responsibility on Key Towns to accommodate and deliver growth in a timely and reliable manner.

Wicklow Rathnew is assigned the largest housing allocation in the county for the period to 2031. As a Key Town, it is therefore essential that the Core Strategy provides not merely sufficient zoned capacity in aggregate, but a robust, resilient and delivery-led land supply capable of accommodating normal and foreseeable levels of delay, non-activation and underperformance during the plan period.

The Core Strategy tables accompanying Proposed Variation No. 6 identify a land requirement of approximately 41 hectares to accommodate housing growth in Wicklow Rathnew to 2031, based on assumed yields. The same tables indicate that approximately 59 hectares of zoned and serviced residential land are available within the settlement.

However, it is evident from the documentation that the 41-hectare figure represents only a baseline requirement. There is no indication that this requirement has been uplifted to include any explicit contingency or headroom allowance to reflect delivery risk, phasing uncertainty, or the likelihood that a proportion of zoned land will not deliver within the life of the plan.

The apparent surplus between the baseline requirement and the aggregate extent of zoned land does not constitute planned headroom. Instead, it arises incidentally from the totality of existing zonings, without any transparent assessment of which lands are realistically capable of delivery during the plan period and which may remain undeveloped or only partially developed.

For a Key Town carrying the single largest housing obligation in the county, reliance on incidental surplus rather than an explicitly planned contingency undermines the resilience of the Core Strategy and exposes it to avoidable delivery risk.

While the Core Strategy refers to zoned and serviced land, servicing is defined primarily by reference to water services capacity. While this is a necessary precondition for development, it is not a sufficient indicator of deliverability in Core Strategy terms.

Other established determinants of housing delivery are not assessed, including land ownership and control, fragmentation and assembly constraints, access and transport limitations, surface water infrastructure requirements, sequencing and phasing considerations, and realistic market absorption rates. In the absence of such analysis, the presence of zoned and serviced hectares cannot reasonably be relied upon as assurance that sufficient housing will be delivered within the life of the plan.

In these circumstances, even modest levels of slippage across a small number of sites would place the Wicklow Rathnew housing target at risk, with consequential implications for the credibility of the Core Strategy as a whole.

National planning policy and Section 28 guidance place increasing emphasis on delivery certainty rather than theoretical capacity. Recent observations and recommendations issued by the Office of the Planning Regulator have consistently distinguished between aggregate zoned capacity and land demonstrably capable of delivering housing within the plan period, particularly in Key Towns and settlements with a strategic role in accommodating growth.

In this context, a Core Strategy that does not explicitly provide contingency at the settlement level and that relies on incidental zoned surplus rather than planned headroom applied to deliverable land does not fully reflect the delivery-led approach now required under national policy and regulatory oversight.

I also concur with another submission to Proposed Variation No. 6, which has identified residential density assumptions of up to 75 dwellings per hectare in Bray, including a blended average density of a similar order across the settlement. While higher densities are appropriate in principle in accessible, well-served urban locations, credible concerns have been raised about the economic viability of apartment-led schemes at these densities in current market conditions. I note that many apartment schemes are currently permitted but not being delivered due to viability issues.

If the density assumption of 75 dwellings per hectare is to be retained as a Core Strategy input, it is necessary to assess the realistic likelihood of such schemes being delivered at scale within the life of the plan. A more viable and therefore more reliable density assumption for Bray would be around 50 dwellings per hectare.

Any adjustment to density assumptions in Bray should be reflected transparently in the Core Strategy, with a corresponding recalibration of housing quantum and land requirements. Such recalibration would have implications for the spatial distribution of growth across the county, including the need to ensure that sufficient additional capacity and contingency are provided in other settlements, potentially including Wicklow Rathnew, to maintain consistency with national housing targets and delivery expectations.

Given the scale of housing growth assigned to Wicklow Rathnew, and the absence of any clearly articulated contingency allowance within the Core Strategy, it is submitted that the current zoning framework does not provide sufficient resilience to ensure delivery within the life of the plan.

To align with national guidance, Section 28 objectives, and established best practice, the Core Strategy should provide for additional residential zoning in Wicklow Rathnew sufficient to incorporate an explicit headroom allowance, typically of the order of 50 per cent above the baseline land requirement. This would ensure that housing delivery remains achievable even where individual sites underperform or fail to activate, that delivery risk is managed proactively, and that a flexible and resilient land supply supports the Key Town role of Wicklow Rathnew.

Such an approach would materially strengthen the Core Strategy and reduce the risk of under-delivery over the plan period.

Proposed Variation No. 6 represents a necessary and appropriate response to revised national housing targets. However, in the case of Wicklow Rathnew, the absence of explicit headroom applied to deliverable land, combined with reliance on incidental zoned surplus, leaves the Core Strategy exposed to delivery risk.

The apparent surplus of zoned land does not distinguish between land that is likely to deliver within the life of the plan and land that may not deliver at all. To ensure that housing targets are achieved within the plan period and in line with the national policy emphasis on delivery certainty, additional residential zoning incorporating a clear, explicit contingency allowance is required.

Yours faithfully,

Niall Melvin

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