

	<h1>Variation No.6</h1>
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Who are you:	Private Individual
Name:	Nimol Holdings Limited
Reference:	VAR6-112140
Submission Made	January 14, 2026 11:28 AM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Chapter 3 – Proposed Variation No. 6

Write your observations here:

To whom it may concern,

Please see attached a submission in relation to the proposed variation number 6 of the Wicklow County Development Plan.

Kind Regards

Upload a File (optional)

NIMOL Holdings Submission.pdf, 0.14MB

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town
Co. Wicklow

13 January 2026

RE: PROPOSED VARIATION NO. 6 – WICKLOW COUNTY DEVELOPMENT PLAN 2022–2028

Dear Sir / Madam,

We wish to make a submission in respect of the proposal to vary the Core Strategy and Housing Policy of the adopted Wicklow County Development Plan 2022–2028.

This submission is made by NIMOL Holdings Limited, which has a direct interest in land holdings across a number of settlements within County Wicklow, including Fassaroe, Ashford, Delgany, Kilcoole and Roundwood. Accordingly, the matters arising from the proposed variation are of material relevance to the future development potential and deliverability of housing within these areas.

We wish to set out that we are supportive of the increase in the population and housing targets proposed to be set by the Council. However, we believe that the densities assumed in the proposed variation will give rise to a development format that is economically unviable.

Based on the published amended Table 3.4 – Future Housing Capacity Wicklow (Levels 1–6 Settlements as of Q3 2025), the proposed average overall densities for development in certain settlements are as follows:

Bray (Level 1): 73.32 units per hectare

Wicklow–Rathnew (Level 2): 49.42 units per hectare

Greystones–Delgany (Level 3): 46.6 units per hectare

It is respectfully submitted that development at the density ranges outlined above will involve the construction of significant numbers of high-density apartments.

Figures released by the Department of Housing in early December 2025 indicated that the cost of construction of an average apartment in Dublin had reached €605,000, while apartments in suburban areas had reached €559,000. The average sales value for apartments in all locations in County Wicklow is below this. Conversely, the cost of construction of Semi Detached Housing and Duplex Units is significantly lower to such an extent that construction of these formats of development is viable.

The result of the density assumptions contained within Proposed Variation No. 6 is to place a reliance on a development format that is widely recognised as economically unviable in the majority of Wicklow settlements.

Whilst the population and housing targets may have been increased through this variation, in practice, because of the lack of economic viability, the measure will not result in the expansion of housing delivery that is urgently required, and which is stated Government policy

For the reasons set out above, it is respectfully submitted that Proposed Variation No. 6 does not apply realistic or deliverable density assumptions.

We suggest that the Council amends the development plan such that the density is 50uph in Bray and 35uph in level 2 & 3 settlements. We also suggest that table 3.4 of the development plan is updated to discount the figures in the columns entitled “zoned land with no live permission” by c. 30% to reflect the net site areas available in each settlement. This to have the effect of taking the net developable site areas for all priority 1 & priority 2 zoned lands into account.

Yours faithfully,

NIMOL HOLDINGS LIMITED

Niall Molloy

Director