Variation No.6

Who are you:	State Body
Name:	Office of the Planning Regulator
Reference:	VAR6-164634
Submission Made	January 16, 2026 4:49 PM

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

- Chapter 1 – Proposed Variation No. 6
- Chapter 3 – Proposed Variation No. 6
- Chapter 6 – Proposed Variation No. 6
- SEA Screening & Determination – Proposed Variation No. 6
- AA Screening & Determination – Proposed Variation No. 6

Write your observations here:

A chara,

Please see attached the OPR Submission on Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028. Please note that the attached submission applies to the plan in its entirety.

Kind regards,
Iuliu Tudose (OPR)

Upload a File (optional)

2026.01.16 OPR Submission on Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028.pdf, 0.21MB

Oifig an Rialaitheora Pleanála
Office of the Planning Regulator

16th January 2026

Variation No.6,
Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.

Re: Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 6 (proposed Variation) to the Wicklow County Development Plan 2022-2028 (County Development Plan).

As Wicklow County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly[1].

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

[1] Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of development plans and variations by planning authorities and the assessment by the Office, was commenced on 31st December 2025. However, section 69(2) provides that the variation of a development plan under section 13 of the Act of 2000 shall continue under that Act after the repeal of section 13 of the Act of 2000.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The proposed Variation includes a change to the County Development Plan with regard to the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) and Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025) including changes to:

- the core strategy;
- policy amendments; and
- density ranges.

Specifically, Core Strategy Objective 1 of the proposed Variation provides that both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of the County Development Plan. The Office supports the change to the zoning status of these lands in providing additional zoned land in key areas that can be brought forward for housing delivery in the short term.

The Office notes, however, that although the Planning Authority has commenced a non-statutory ‘Call for Sites’, no new residential zoning has been brought forward as part of the proposed Variation on the basis that that sufficient land has already been zoned consistent with the requirement of the Housing Growth Guidelines.

However, having examined this approach in detail, the Office is concerned that it may be overly cautious in the Dublin Metropolitan Area. This is particularly relevant given the reliance on the full development of lands already zoned at Fassaroe and the realistic lead times required for planning, coordination and delivery of the necessary infrastructure to support the development of these lands. Furthermore, the Office estimates that the gross-to-net density assumptions used to estimate the requirement for residential zoned land are conservative and may underestimated the actual needs.

In light of these issues, the Office considers that the proposed Variation adopts an overly cautious approach by not bringing forward additional lands beyond the Phase 2 lands at locations within the Dublin Metropolitan Area that are accessible to existing or planned high-quality public transport. On this basis, the Office recommends that identifying additional zoned lands would be advisable to provide contingency for the short to medium term.

In this context, the submission sets out recommendations in relation to:

- the process used to estimate the potential housing numbers that can be achieved on the zoned lands;
- the critical role of residential zoned lands at Fassaroe in meeting the housing growth requirement, and the need for a collaborative strategy with key stakeholders that can unlock infrastructure constraints and accelerate the development of the lands; and
- the opportunity to identify long term strategic and sustainable development sites / opportunity areas, particularly within the Dublin Metropolitan Area to align with long lead-in timeframes for infrastructure delivery, giving clear strategic direction of future development locations.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) recommendation under the following key theme:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-

Implementation of the housing growth requirements

As stated above, the Office welcomes the proposed inclusion of Core Strategy Objective 1 of the proposed Variation which states that both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of the County Development Plan. The Office recommends, however, that the Planning Authority provides absolute clarity that Phase 2 / Priority 2 lands now have a same status as Phase 1 lands, and are available for immediate development subject to the regular requirements of the development management process.

The Office also welcomes the inclusion of a revised core strategy table (table 3.5) which details the new housing growth requirements for each area within the county and the units under construction as of Q3 2025, units yet to be commenced and units permitted but subject to appeal / JR. However, the Office considers that providing additional information below would provide greater clarity and certainty. Such information should include the baseline housing growth requirement for the county to 2031 (in accordance with appendix 1 of the Housing Growth Guidelines, of 14,476 units) and the amount of zoned and serviced land available in each settlement to meet this requirement, followed by lands with units under construction and yet to be commenced in each settlement, and the additional provision of zoned and serviced land available.

Table 3.4 and table 3.5 of the proposed Variation indicate that the quantum of zoned and serviceable land is sufficient to meet the housing growth requirement of 14,476 units to 2031, with capacity for 50 per cent additional provision. This table clearly sets out the net densities used in this process and how they align with the recommended ranges in the Compact Settlements Guidelines. However, the gross-to-net density assumptions used to determine the site area to which these densities can be applied (i.e. excluding roads, open spaces, landscaping etc) is not specified.

According to the Compact Settlements Guidelines, the net site area typically represents approximately 65–80 per cent of the gross area, though this varies by site and local context. Based on the information available, the Office estimates that achieving the housing growth requirement and allowing for additional provision would require net site areas at the upper end of this range across all sites.

The Office therefore recommends that the Planning Authority review the assumptions being relied upon as above and, where such assumptions may not be fully justified based on the area of land involved and local circumstances, consider the need for additional lands for housing delivery.

With regard to lands zoned for Residential-High Density at Fassaroe, which account for approximately 80 per cent of zoned and serviced lands available for development in Bray, the Office recognises that the Bray and Environs Transport Study (2019) (BETS), prepared by the Planning Authority, National Transport Authority (NTA) and Transport Infrastructure Ireland (TII), sets out requirements under table 3.1 for Fassaroe Phase 1 which would comprise approximately 650 units. However, for further phases of development at Fassaroe, the BETS proposes a separate implementation and monitoring plan for development by the Planning Authority with NTA and TII input.

Progressing the above is a key step that can and should be advanced at the earliest opportunity to enable the development of the Fassaroe lands which, together with the neighbouring area of Old Connaught in Dún Laoghaire-Rathdown, comprise a strategic land bank with the capacity to deliver housing at scale in the Dublin Metropolitan Area.

While there may be areas of the landbank that are less reliant on infrastructure delivery, the Office is of the view that a targeted, proactive, and cross-departmental approach will be essential to ensure accelerated and coordinated delivery of the wider landbank, and recommends that the Planning Authority works with Dún Laoghaire-Rathdown County Council, relevant infrastructure agencies such TII and the NTA, and relevant development sector interests with the capability to progress housing delivery in the short to medium term to establish and implement an Infrastructure Planning and Delivery Strategy in accordance with RPO 4.40 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly.

This approach would align the planning authorities, infrastructure agencies and development interests around a clear roadmap, ensuring that future development is supported by adequate road access and high-quality public transport links, and reducing the risk of land being zoned but remaining undeveloped due to any uncertainties regarding the manner and/or timing of infrastructure delivery.

Notwithstanding any measures put in place to accelerate the development of the Fassaroe lands, the Housing Growth Guidelines (section 3.1) clearly state that it may be necessary to consider the zoning of alternative lands where lands, such as the full Fassaroe landbank, may not be fully developed in the short to medium term.

Recognising the strategic importance of Bray and Greystones-Delgany within the Dublin Metropolitan Area, and the need to maintain a strong pipeline of zoned and serviced land, the Office recommends that the Planning Authority identifies additional residential zoned lands within these areas with accessibility to existing and planned high-capacity public transport corridors, in accordance with the principles of Transit-Oriented Development (TOD) and consistent with NPO 97 of the NPF.

Looking beyond the current plan period, the proposed Variation recognises that the quantum of zoned land is not sufficient to meet the long-term housing growth requirement set out in the Housing Growth Guidelines to 2040. Given the importance of the settlements of Bray and Greystones-Delgany within the Dublin Metropolitan Area, the Office also considers it critical that long term strategic and sustainable development sites / opportunity areas are identified in accordance with the Housing Growth Guidelines, to ensure that identified and required new infrastructure is delivered in tandem with new residential development, aligning within the lead-in time for infrastructure delivery and the provisions of the NPF related to TOD.

In this respect the Office notes that the Planning Authority has commenced a non-statutory 'Call for Sites', which could inform the consideration and response to the points raised in this submission, and the recommendations made below.

Recommendation 1 - Implementation of the Housing Growth Requirements
Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, ensuring that the plan zones sufficient land for residential development with a realistic prospect of delivery within the plan period, and in particular to: • NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042;

- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- NPO 97 of the NPF for planned growth in the metropolitan area along existing or planned high-capacity public transport corridors in accordance with the principles of Transit-Orientated Development;
- RPO 4.40 of the RSES to undertake the development of Bray-Fassaroe in collaboration with the Planning Authority, Dún Laoghaire-Rathdown County Council and transport agencies;
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans; and
- the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), including appendix B: Measuring Residential Density,

the Planning Authority is recommended to:

(i) clarify that Phase 2 / Priority 2 lands are available for immediate development;

(ii) amend table 3.5 Wicklow core strategy to including the baseline housing growth requirement in accordance with appendix 1 of the Housing Growth Guidelines of 14,476 units to 2031, the quantum of zoned and serviced land available in each settlement to meet this requirement (HA), and the estimated housing yield / capacity of those lands;

(iii) clarify the gross / net densities applied to the determination of how much capacity can be achieved on available zoned and serviced land and, if necessary, zone additional lands for residential development to provide a sufficient additional provision of zoned lands to achieve the housing growth requirement figures outlined in appendix 1 of the Housing Growth Guidelines;

(iv) commit to the preparation of an Infrastructure Planning and Delivery Strategy for the Fassaroe lands, working together with Dún Laoghaire-Rathdown County Council, relevant infrastructure agencies including Transport Infrastructure Ireland, the National Transport Authority, and landowners. This strategy should

establish a targeted and proactive approach to ensure the accelerated delivery of housing and associated infrastructure, services and amenities at this strategic location within the Metropolitan Area Spatial Plan area.

(v) taking account of the significant transport infrastructure and accessibility constraints at the Fassaroe lands, and the potential that all of the lands may not be developed by 2031, identify additional residential zoned lands within the Dublin Metropolitan Area (Bray and Greystones-Delgany). This will ensure that the Wicklow County Development Plan 2022-2028 provides a robust and realistic framework to achieve the housing growth requirement figures outlined in appendix 1 of the Housing Growth Guidelines; and

(vi) identify long term strategic and sustainable development sites / opportunity areas within the Dublin Metropolitan Area (Bray and Greystones-Delgany) to give clear strategic direction to future development locations, in consultation with infrastructure providers.

Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

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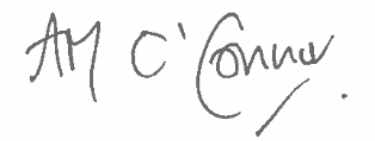

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015